



---

## ESSSUPER MODERN SLAVERY STATEMENT - 2025

**ESSSuper**  
EMERGENCY SERVICES SUPERANNUATION BOARD  
ESSSUPER MODERN SLAVERY STATEMENT - 2025

# Contents

- 1. Purpose of the Statement ..... 3
- 2. Scope of the Statement ..... 3
- 3. Reporting Entity ..... 3
  - Reporting Entity Structure ..... 4
  - Values ..... 4
  - Suppliers ..... 4
  - Supply chains ..... 5
  - Investments ..... 5
- 4. Risk assessment and due diligence ..... 6
  - Assessment and actions to address modern slavery risks ..... 7
- 5. Future commitments ..... 7
- 6. Approval ..... 8
- 7. Appendix ..... 9

## 1. Purpose of the Statement

The Emergency Services Superannuation Board (Board) acknowledges its responsibility to protect human rights. We do not tolerate modern slavery or human trafficking in our organisation or supply chain. This statement is made pursuant to the criteria outlined in section 16 of the Modern Slavery Act 2018 (Cth) (MSA). It describes our present and ongoing commitment to minimise the risk of modern slavery and human trafficking occurring within our supply chains and business. It covers the period of the financial year ending 30 June 2025.

## 2. Scope of the Statement

The Board has issued this Statement to reflect the requirements of the Modern Slavery Act 2018 (Cth) (MSA).

The Board has established an internal review process to:

- identify ESSSuper's exposure to modern slavery in its operations and supply chains;
- educate staff and suppliers to recognise potential risks and apply mitigation strategies and practices; and
- increase awareness of modern slavery in the Fund's business activities.

## 3. Reporting Entity

Emergency Services Superannuation Scheme (ESSSuper) is an exempt public sector superannuation scheme under the Commonwealth's Superannuation Industry (Supervision) Act 1993 (SIS) and related superannuation legislation, whose members include emergency services employees and state government employees within the State of Victoria.

The Board acts as the administrator of ESSSuper. The Board administers the State's complex statutory defined benefit superannuation funds and other administered schemes and is responsible for meeting its obligations under the Emergency Services Superannuation Act 1986 (Vic).

The Board employs over 150 people, all of whom are based in Australia. Our workforce consists of predominantly permanent employees across a variety of professional roles.

Our members are active or retired public servants who provide essential services to the community. The majority of ESSSuper members are staff of Victoria Police, Fire Rescue Victoria, Ambulance Victoria, and Victorian Government schools.

Our mission is to help members achieve their superannuation and retirement goals, while meeting stakeholder responsibilities. ESSSuper has more than 121,000 members holding over \$39.5 billion in defined benefit and accumulation assets (as of 30 June 2025).

ESSSuper aims to grow and protect our members' superannuation and support them throughout their lives. To achieve this the Fund provides options, information and advice to ensure members can make the best choices to meet their retirement goals.

ESSSuper is administered under the laws of the State of Victoria (including the Emergency Services Superannuation Act 1986, the State Superannuation Act 1988, the State Employees Retirement Benefits Act 1979 and the Transport Superannuation Act 1988).

The Board is the reporting entity for this statement, and it does not own or control any other entities for the purpose of consultation relating to this statement.

## Reporting Entity Structure

ESSSuper is a registered business name of the Emergency Services Superannuation Board (the Board) (ABN 28 161 296 741).

The Board manages and administers the Emergency Services Superannuation Scheme and all other administered schemes (the Fund) (ABN 85 894 637 037).

The Fund is governed by the Emergency Services Superannuation Act 1986 (Vic) and provides benefits for current and former Victorian emergency services employees, certain public sector employees and their partners.

## Values

The Board has over 150 employees, all of whom are based in Australia and all of whom are provided with MSA awareness training. The Fund recognises the contribution each employee makes to the organisation and has identified four fundamental values expected of every staff member, which are based upon Accountability, Trust, Collaboration and Courage.

## Suppliers

In addition to staff, the business had 260 suppliers of goods and services in the 2024/25 financial year. These include general service providers, consultants, investment managers, investment advisors, and specialist service providers directly associated with the superannuation industry.

The suppliers provide services that directly relate to the administration and investment of members funds. Purchases of material and equipment are minimal and are undertaken within the Victorian Government Procurement principles and guidelines.

Assessing financially material Environmental, Social and Governance (ESG) issues is embedded within ESSSuper's Investment Governance Framework and applies across all asset classes. For Accumulation Plan mandates, ESG factors are considered in all manager appointments and ongoing reviews. The depth and weighting of this analysis are determined on a materiality basis – meaning they are proportionate to the underlying risks of the asset class and strategy, the expected impact on risk and return, and are aligned with the Board-approved Responsible Investment Policy. Materiality assessments are supported by our Investment Adviser's ESG capability ratings (1–5 stars), as well as both internal and externally sourced research.

ESSSuper appoints external investment managers based on multiple factors – including non-ESG considerations such as strategy alignment, team quality and stability, investment process and risk controls, performance relative to benchmarks, fees and costs and liquidity – and, where financially material, the extent to which the manager identifies and manages ESG risks and opportunities (for example, climate transition and physical risks, labour and human-rights practices including modern slavery, and governance or board effectiveness). ESG risks are assessed alongside non-ESG factors on a materiality basis, taking into account the characteristics of each asset class and strategy. Appointed external managers are monitored annually through a structured questionnaire that covers both ESG topics (e.g., integration approach, stewardship and engagement activities, modern-slavery risk management, climate risk, and governance) and non-ESG topics (e.g., fees and costs, liquidity, strategy alignment, team stability, mandate compliance and reporting). The questionnaire is part of ESSSuper's annual survey of fund managers and supplements our adviser's ESG capability ratings (1–5 stars). Responses evidence current practices, identify gaps, guide our engagement priorities, and inform ongoing appointment decisions alongside performance and risk monitoring.

Manager responses are incorporated into ESSSuper's annual monitoring cycle across all appointed managers, alongside performance and risk reporting. The Investments team analyses questionnaire outcomes and portfolio data and prepares recommendations for the Investment Committee; decisions on ongoing appointments, portfolio parameters, or terminations are then approved in line with the

Investment Governance Framework. The depth of review is risk-based and may be more comprehensive for higher-risk strategies or managers (for example, where mandate complexity, liquidity, or stewardship considerations warrant), although all managers are included in the annual monitoring process.

In determining whether a manager's ongoing appointment remains appropriate, ESSSuper assesses non-ESG factors such as strategy alignment, team quality and stability, investment process and risk controls, performance relative to benchmarks, fees/costs, liquidity, and mandate compliance, and – where financially material – the manager's identification and management of ESG risks and opportunities (e.g., climate transition/physical risk, labour and human-rights practices including modern slavery, and governance/board effectiveness) consistent with the Board-approved Responsible Investment Policy. ESG is weighted alongside non-ESG factors on a financial materiality basis – the attention to ESG is greater in asset classes/strategies where its expected impact on risk/return is higher (particularly equities and other growth-oriented investments).

## Supply chain

ESSSuper's exposure to Modern Slavery risks in its activities and supply chain are considered low as:

- it does not operate in or directly acquire services from industries subject to known high risks;
- it only operates within Australia, primarily employing the services of Australian based suppliers;
- service providers predominantly supply technical expertise, advice and IT software; and
- purchases of equipment, materials and office supplies are through approved supplier contracts.

ESSSuper's primary supply chain relates to the administration of superannuation account balances and the investment of employer and member contributions. Service providers are mostly based in Australia and operate under contracts that meet the Victorian Government's procurement requirements, which include social as well as financial targets.

ESSSuper is also required to comply with Victorian Government social procurement directives regarding the organisation's use of its buying power to generate social value above and beyond the value of the goods or services being procured. This closely aligns with the MSA approach to social and community awareness in its activities and operations.

ESSSuper had 260<sup>1</sup> business services suppliers in 2024/25, (excluding investment management services) and the top 20 suppliers represent more than 73% of total expenditure on suppliers. Of the top 20 suppliers, 13 had their own Modern Slavery Statements and the remainder, either did not meet the threshold for the mandatory issuance of an MSA statement or have responded to ESSSuper's Modern Slavery risk assessment program and have confirmed low to zero risk exposure. Of the 260 business services suppliers, 83 (32%) had issued Modern Slavery Statements. ESSSuper had a further 49 investment managers in 2024/25 and all of them had their own Modern Slavery Statements or policies addressing modern slavery in their supply chains.

## Investments

All investments undertaken by ESSSuper are made in accordance with the Board's investment goals, the Borrowing and Investment Powers Act 1987 and the Victorian Treasurer's Prudential Statement investment guidelines.

---

<sup>1</sup> The Modern Slavery Act applies to entities based in Australia, or operating in Australia, with annual revenue in excess of \$100M (incl GST) who are required to report annually on the actions they have taken to address modern slavery risks in their operations and supply chains.

Investment responsibilities for the defined benefit assets were transferred to the Victorian Funds Management Corporation (VFMC) on 1 July 2006. As on 30 June 2025, the amount managed by VFMC was \$28.1B. However, the Board retains investment responsibilities for managing the accumulation assets and is responsible for setting investment objectives for both the accumulation and defined benefit assets. VFMC issues its own Modern Slavery Statement.

In order to encourage better corporate practices that align with members’ best interests, the Fund exercises its right to vote on shareholder resolutions. The Fund has appointed a specialist proxy voting adviser to vote on its behalf and manage most operational aspects of the proxy voting process. The goal of the proxy voting advisor is to protect and enhance shareholder value through active communication with companies in regard to ESG risks.

## 4. Risk assessment and due diligence

In consideration of the MSA, ESSSuper undertakes an annual examination of the risk characteristics of its suppliers, with a focus on areas of known vulnerability and risk exposure and review of adoption of modern slavery risk policies and practices. This examination involves a review of the type of services provided, the nature of the suppliers’ workforces and their location and any public statements or policies that detail the suppliers’ actions in regard to addressing and preventing modern slavey risks in their supply chain. This is supplemented by a questionnaire to selected suppliers with potentially higher risk or less public information available regarding their approach to modern slavery compliance. The questionnaire assists ESSSuper in assessment of the awareness of, and actions taken by, these suppliers in regard to modern slavey risk exposure in their supply chain.

The types of goods and services procured by ESSSuper are:

Type	Purpose
Member Administration services	Administration system services, call centre(s)
Technology	Hardware (PCs, printers, servers) and software (security, operating system licensing)
Operational Service Contracts	Investment Managers, data, custodian, telecoms
Workplace	Building lease, cleaning contract, office equipment
Professional Services	Internal audit, investment advisory, legal, taxation, risk and compliance
Marketing	Marketing analytics, seminar venues, merchandise
Labour hire	Professional contract staff
Other	Accommodation, travel, incidentals

In the process of identifying modern slavery exposure, ESSSuper focused on its procurement practices and suppliers. Procurement practices at ESSSuper are undertaken having regard to the Victorian Government Purchasing Board standards and guidelines.

Contracts are reviewed relative to known categories of at-risk groups to allow efforts to be directed to the areas where the most risk or uncertainty was identified. These groups and the products they relate to are outlined in the following table.

Groups	At risk group examples
Industry Type	Textile production, electronics manufacture, cleaning services
Supplier location	As per Global Slavery Index
Commodity type	Garments, electronics
Nature of workforce	Low skilled, low paid, seasonal workers, in isolated locations, vulnerable to exploitation
Supplier operating condition	Inadequate labour laws, absence of grievance mechanisms or worker organisations and workers' representatives
Supply chain model	Sub-contracted workers, complex supply chains, complex employment relations with reliance on agency
Labour hire	Contractors
Other	Accommodation, travel, incidentals

Ref: UK Civil Service: Tackling Modern Slavery in Government Supply Chains

### Assessment and actions to address modern slavery risks

The supplier review undertaken in relation to supplier contracts in place during the 2024/25 financial year has not identified any occurrences of modern slavery and all suppliers were identified as either low risk or taking action in areas of potential exposure in their supply chains, such as those shown in the table above. This reflects the nature of the businesses they operate, services they supply and countries in which they operate.

The use of questionnaires over the past five years and examination of the responses have provided useful information on the approach taken by individual suppliers and assists the Board to understand their level of their awareness of Modern Slavery and their ability to identify potential exposure. This also allows ESSSuper to identify businesses with room for improvement and to encourage them to take actions which will demonstrate their commitment to MSA principles. These actions reinforce ESSSuper's expectations of its suppliers to continue developing their own modern slavery practices and values that are aligned with those of ESSSuper.

ESSSuper provides Modern Slavery training every year to all staff through an online course which is part of ESSSuper's compliance training program.

## 5. Future commitments

In 2025/2026 ESSSuper's focus will be to continue to:

- include modern slavery clauses in all 'approach to market' documents, and in all contracts of major suppliers;
- monitor risks of potential modern slavery in ESSSuper's supply chain;
- incorporate the supplier code of conduct (updated by VGPB effective July 2025) into tender packs;

- 
- conduct annual surveys of fund managers to confirm that they have appropriate policies in place; and
  - provide regular staff training to enhance awareness and understanding of areas of risk exposure to modern slavery in operational activities.

## 6. Approval

This modern slavery statement was approved by the Emergency Services Superannuation Board on 11 December 2025.



**Joan Fitzpatrick**  
**President**

## 7. Appendix

This statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018. The table below identifies where each criterion is disclosed within the different sections of the statement.

Mandatory criteria for modern slavery statements	Reference page
Identify the reporting entity	3
Describe the structure, operation and supply chains of the reporting entity	4
Describe the process of consultation with any entities that the reporting entity owns or controls; and in the case of a reporting entity covered by a statement under section 14 of the Act – the entity giving the statement	4
Describe the risk of modern slavery practice in the operation and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	6
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	5-7
Describe how the reporting entity assesses the effectiveness of such actions	7
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	8