



AUSTRALIAN
CATHOLIC
SUPERANNUATION
RETIREMENT FUND

Modern Slavery Statement


For the year ending
30 June 2021

Published December 2021




Contents


Introduction	3
Organisational Structure	3
Our Operations	3
Our Supply Chain	4
Our Investments	4
Relevant Fund Policies	4
Modern slavery risks and actions taken to assess and address risk of modern slavery	5
Operational Risk	5
Governance and policy	5
Member Communication	5
Collaboration	5
Supply Chain Risk - investments	6
Supply Chain Risk - other	6
Assessing the effectiveness of our actions	7
Looking ahead/future commitments	7
Consultation with entities owned or controlled	8
Detail on approval of this Statement	8

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Prepared by SCS Super Pty Limited
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Introduction

This Modern Slavery statement is for the period 1 July 2020 to 30 June 2021. This statement is published in accordance with the Modern Slavery Act 2018. This statement outlines the past financial year commitments made by the Fund in relation to modern slavery.

Organisational structure

We, as trustee of the ACSRF, are bound by the Australian Modern Slavery Act 2018 (Commonwealth) ("the Act").

This is ACSRF's second Modern Slavery Statement (Statement) prepared and issued on behalf of SCS Super Pty Limited (ABN 74 064 712 607) as the Trustee for Australian Catholic Superannuation and Retirement Fund (ABN 24 680 023) (ACSRF). This Statement is for the purpose of reporting under the Act.

SCS Super Pty Limited will be referred throughout the document either by its name or as 'Trustee', 'we', 'us' or 'our'.

The Trustee is the principal governing body of ACSRF and has consulted a broad range of internal and external stakeholders and suppliers in preparing this Statement.

Our Operations

ACSRF is proud to have over 87,880 members, 15,000 employers and a portfolio of \$10.76 billion (as of September 30th, 2021). We employ 120 staff who are located across Australia.

The CEO office, Human Resources, Marketing, Investments, IT and Finance teams are located in the Registered Office (Head Office) 33 Burwood Road, Burwood, NSW 2134. These buildings are owned by the Fund.

ACSRF is a public offer profit-to-member fund, which exists solely for the benefit of its members. We provide superannuation and pension products and services. In delivering these services, we have relationships with a range of externally sourced suppliers. These relationships are managed by short and long term contractual arrangements.



Our Supply Chain

Our supply chain can be broadly broken down into the following categories:

- marketing (branded and unbranded goods for events and not for resale)
- corporate and organisational procurement:
- cleaning services of premises
- travel services for staff and directors (prior to COVID-19)
- office supplies
- catering
- information technology
- banking and insurance

Our Investments

Given our purpose, we have a large investment portfolio for the benefit of our members. Our investment portfolio spans Australian and international equity markets, direct property, infrastructure and private equity investments. We currently invest in more than 30 countries, and have investments across a number of sectors including energy, IT, material, financial services property, healthcare and telecommunications. We have mandates (via Investment Management Agreements, Service Level Agreements or through commingled Unit Trusts) with external investment managers to manage 100% of our Investment activity.

Further information on our approach to investing is set out in our Annual Report and Product Disclosure Statement.



Relevant Fund Policies

- Modern Slavery Policy
- Purchasing Policy
- Remuneration policy

Modern slavery risks and actions taken to assess and address risk of modern slavery



Operational Risk

We acknowledge that the prevalence and impact of COVID-19 may increase the vulnerability of workers in the global supply chain. The Fund is mindful of the importance in incorporating consideration of modern slavery risks as part of our broader response to this global pandemic.

Where possible, we will continue to engage with our suppliers and request information on modern slavery risks in their operations and supply chain. However, we are mindful that entities that continue to be impacted by COVID-19 may be temporarily unable to or delayed in implementing actions to address modern slavery or risks of same.

Some initiatives that we had planned for this reporting period were delayed due to COVID-19 and we will report back next year on their progress.



Governance and policy

This year the Fund has taken steps to identify and manage risk within our supply chain that includes adopting a Modern Slavery Policy and updating of our purchasing policy to include questionnaires for new suppliers.



Member Communication

The Fund has updated our public website to include information on our modern slavery activities including providing a copy of our policy, statements and relevant information pertaining to modern slavery.



Collaboration

We continue to be part of the Australian Catholic Anti-Slavery Network (ACAN), where we are able to collaborate and share initiatives with other network partners. By doing this, we are able to assess our progress, our frameworks and utilise this as a feedback mechanism to help us measure the effectiveness of our actions.



Supply Chain Risk - investments

Australian Catholic Superannuation has appointed Frontier Advisors to conduct an analysis of the Modern Slavery risks in our Australian and Global Equities Portfolios.

The results of Frontier's output can be summarised as:

- The Fund has detailed and summary data for each of the portfolios managed by its investment managers
- The Fund will be sharing this data with its investment managers as both a compliance tool and as an engagement tool that can be used to improve our investment portfolios and reduce the risk of modern slavery within each portfolio.

The Frontier analysis outlines countries, sectors and companies where risks are elevated.

The Fund makes a number of considerations in terms of Modern Slavery. We have analysed our equity portfolios and the companies we invest in to ensure that they align to our role in Modern Slavery, both in identifying and minimising associated risks.

The Fund takes Modern Slavery seriously, and notes that these are the early steps of our journey to stamp out associated issues. Continued initiatives and analysis will follow in future years, with the Fund taking timely action if there is an area of concern. This may include exclusions, or termination of investment managers (if appropriate).



Supply Chain Risk - other

Additionally the Fund has taken reasonable steps to contact suppliers who are considered high risk due to the industry and location, and to identify risks within their organisations. These suppliers include:

- IT
- Building Maintenance
- Catering
- Operations Services

Questionnaires to organisations from identified risk categories have been developed and distributed to our suppliers across differing categories.

Although, at this stage, the Fund has not identified any suppliers to be of serious concern, we will continue to work with our partners to ensure supplier risk is minimised. Additional questionnaires have been sent out to suppliers who we require more information or have identified potential risks with. All responses have been reviewed and recorded. Moving forward, the Fund will consciously work with new suppliers to identify risks as part of the procurement process.

Assessing the effectiveness of our actions

We continue to build out our framework for identifying and assessing risks of modern slavery, particularly within our supply chain.

We have a foundation to assess modern slavery risks when engaging new suppliers in accordance with our internal policies and utilise a system of reporting and escalating any potential modern slavery risks.

We have a dedicated modern slavery liaison officer who oversees the framework to engage with key stakeholders and oversee the function of the modern slavery framework.

Our current activity is focused on assessing modern slavery risk and utilising our established frameworks to address risk.

Looking ahead/future commitments

Priorities	Activities
Policy review & development	<ul style="list-style-type: none"> We will have an ongoing review of our procurement policy Consider the application of a Supplier Code of Conduct
Internal processes	<ul style="list-style-type: none"> We will broaden our working group to ensure the most representative sample of staff As part of our formal monthly working group meetings, key representatives from each business unit will be invited to participate and provide broader perspectives of modern slavery within their business units. We will continue to review and improve existing policies and procedures, including procurement frameworks and grievance mechanisms. Continue to integrate modern slavery clauses into contracts/tender process. Review and enhance how we categorise our suppliers based on risk.
Member communication	<ul style="list-style-type: none"> We will review and where required enhance the section on our website on Modern Slavery to help raise awareness within our member base.



Consultation with entities owned or controlled

The Fund does not own or control any other entities.

Detail on approval of this Statement

This Statement was approved by the Board of SCS Super Pty Limited as Trustee for Australian Catholic Superannuation & Retirement Fund.

In submitting this Modern Slavery Statement for the FY2021, we have made our best endeavours to provide an honest observation of the Fund's current approach and future plans to understanding, identifying, assessing and addressing the risk of modern slavery in its operations and supply chains.

Our Fund, its Board and staff fully recognise that we are on a journey to improve modern slavery risk identification and mitigation. We are committed to working with our peers, suppliers and other organisations to help prevent modern slavery. Our 2021 Statement reports on our work during this year and sets the foundation for our continued efforts to deepen and enhance our responses in the future years.

Approved and signed on: 2 December 2021

David Hutton, Chair
SCS Super Pty Limited as Trustee for
Australian Catholic Superannuation & Retirement Fund

Greg Cantor, Chief Executive Officer
Australian Catholic Superannuation & Retirement Fund

