

# Modern Slavery Statement

2022





# About this statement

This joint modern slavery statement is prepared and issued by the following reporting entities: AustralianSuper Pty Ltd ABN 94 006 457 987 AFSL 233788, the Trustee of AustralianSuper ABN 65 714 394 898, AS Infrastructure No. 1 (Holding) Pty Ltd as trustee for AS Infrastructure No. 1 (Holding) Trust ABN 97 829 937 789, AS Infrastructure No. 2 (Holding) Pty Ltd as trustee for AS Infrastructure No. 2 (Holding) Trust ABN 42 643 099 427, AS Infrastructure No. 3 (Holding) Pty Ltd as trustee for AS Infrastructure No. 3 (Holding) Trust ABN 89 979 226 084, AS Infrastructure No. 3 (Operating) Pty Ltd as trustee for AS Infrastructure No. 3 (Operating) Trust ABN 61 195 183 925, AS Infrastructure WestConnex (Holding) Pty Ltd as trustee for AS Infrastructure WestConnex (Holding) Trust 96 789 213 059, AustralianSuper Investments Pty Ltd as trustee for AustralianSuper Investments Fund No. 2 ABN 52 933 108 120, AustralianSuper Investments Pty Ltd as trustee for AustralianSuper Investments Fund No. 3 ABN 27 817 108 058, AustralianSuper RAAD Pty Ltd as trustee for AustralianSuper RAAD Trust 24 644 589 250, and AS International Fixed Income Pty Ltd as trustee for AS International Fixed Income Trust 32 746 499 754. When we use the terms 'AustralianSuper', 'the Fund', 'the Trustee', 'we', 'us', or 'our', we mean AustralianSuper Pty Ltd and the entities listed above.

AustralianSuper is pleased to publish this Modern Slavery Statement ('the Statement') in accordance with section 14 of the Australian Modern Slavery Act 2018 (Cth) ('The Modern Slavery Act') for the reporting period 1 July 2021 to 30 June 2022 ('Reporting Period'). All Fund and investment data is as at 30 June 2022, unless otherwise stated. All care is taken to ensure this information is correct at the date of publication. Any errors or misprints will be corrected by the Trustee in future statements.



# Australian Modern Slavery Act 2018 (Cth) reporting criteria

## **Criterion 1 and 2**

Identify the reporting entity and describe its structure, operations and supply chains

**2; 6-9**

## **Criterion 3**

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

**10-16**

## **Criterion 4**

Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

**17-22**

## **Criterion 5**

Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risk

**23**

## **Criterion 6**

Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)

**6-7**

## **Criterion 7**

Any other relevant information

**4-5; 24**





## Introduction

# Chair, Dr Don Russell and Chief Executive, Paul Schroder

Modern slavery is a significant global issue impacting some of the most vulnerable people in society. According to the latest Global Estimate of Modern Slavery, there were an estimated 50 million victims of modern slavery in the world in 2021, an increase of 10 million people over the last five years.<sup>1</sup>

Almost two-thirds of the world's modern slavery victims are in the Asia Pacific region.<sup>1</sup> There is also growing evidence that developed countries are much more exposed to modern slavery than previously estimated, with more than half of all forced labour in upper-middle income or high-income countries.<sup>1</sup> The research found that migrants were three times more likely to be victims of forced labour than non-migrant adults. While its prevalence is often grounded in conflict and oppression, a range of factors are driving modern slavery in different countries, with demand for cheaper goods, such as new technologies, a key driver in more developed countries.<sup>2</sup>

With member assets of more than \$258 billion, AustralianSuper is a significant investor in Australian and international markets. In our role as trustee on behalf of almost 2.9 million members, we acknowledge the risk modern slavery presents across our operations and investments.<sup>3</sup> We also recognise the responsibility we have to actively address modern slavery risks through our direct actions and collaborations with other investors and civil society.

AustralianSuper has a long-standing program of integrating modern slavery and labour force considerations into our investment decision-making process and stewardship activities. Companies or assets with business models and value chains that rely on forced labour and other forms of modern slavery may generate unsustainable earnings. This can have a negative impact on investment valuations and members' returns.

<sup>1</sup> Global Estimates of Modern Slavery: Forced Labour and Forced Marriage International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), Geneva, 2022.

<sup>2</sup> Walk Free, Global Slavery Index 2018: [www.globalslaveryindex.org/news/developed-nations-far-more-exposed-to-slavery-within-their-borders-than-previously-thought/](http://www.globalslaveryindex.org/news/developed-nations-far-more-exposed-to-slavery-within-their-borders-than-previously-thought/)

<sup>3</sup> As at 30 June 2022.





As a leading responsible investor, AustralianSuper actively engages with companies to encourage positive outcomes on Environmental, Social and Governance (ESG) issues, such as modern slavery.<sup>4</sup> We assess the risk of modern slavery, and its potential impact on investment value as part of our investment approach. The Fund also participates in collaborative investor initiatives, where we seek to amplify our voice, influence global change and advocate for improved industry standards on modern slavery.

Consistent with the requirements of the Modern Slavery Act, this statement focuses on modern slavery from a risk to people perspective. This approach looks to determine where modern slavery risks are likely to be most prevalent based on their impact on individuals, rather than investment value, level of expenditure or impact to the business.

AustralianSuper has continued to evolve our approach to modern slavery and is committed to improving our processes and actions. Our FY22 statement demonstrates the progress made and new initiatives we are implementing to expand and refine how we're addressing the risks of modern slavery practices in our investments and operations.

This statement was approved by the Board of directors of AustralianSuper Pty Ltd pursuant to section 14(2)(d)(ii) of the Modern Slavery Act on 27 October 2022.

**Dr Don Russell**  
Chair, AustralianSuper Pty Ltd

**Paul Schroder**  
Chief Executive, AustralianSuper Pty Ltd

### FY22 highlights

- Continuation of a comprehensive company engagement program prioritising increased disclosure of how businesses are addressing modern slavery risks and gaining an in-depth understanding of company supply chains and supplier relationships.
- Expanded modern slavery assessment by independent service provider FairSupply to include the Fund's property and infrastructure assets in the investment portfolio, and existing suppliers in our procurement process. This assessment identifies the countries, industries and companies that pose the highest modern slavery risks through an in-depth examination of their supply chains.
- Enhancing our asset level integration framework for unlisted assets in relation to modern slavery and commencement of an ESG training program, that includes modern slavery, for non-executive directors on our larger, directly held unlisted assets.
- Continuing our membership of Investors Against Slavery and Trafficking Asia-Pacific (IAST APAC), which is creating a consistent framework and coordinated engagement program to encourage companies to adopt best practice approaches to identifying and mitigating modern slavery risk in company supply chains.
- Continued involvement in and Board membership of the Cleaning Accountability Framework (CAF) to improve labour practices for workers in the high-risk cleaning industry.
- Our continued membership of the Australian Council of Superannuation Investors (ACSI) and the Responsible Investment Association Australasia (RIAA) Human Rights Working Group.
- Ongoing assessment and benchmarking of modern slavery policies and approaches of the Fund's external investment managers.
- Implementation of the Fund's Third-Party Management Framework (TPMF) within our procurement function to standardise our supplier risk management practices, including those related to modern slavery.

<sup>4</sup> AustralianSuper is recognised as a Responsible Investment Leader 2022 by the Responsible Investment Association Australasia (RIAA).





## Criterion 1, 2 and 6

# About us

AustralianSuper is the fund for all Australians. The largest superannuation fund in Australia and one of the largest in the world<sup>1</sup>, AustralianSuper manages the retirement savings of more than one in eight working Australians.<sup>2</sup>

With members at the centre of everything we do, our purpose is to help members achieve their best financial position in retirement.

As a large, global investor we invest in a mix of quality assets to grow members' savings over time. As at 30 June 2022, AustralianSuper manages more than \$258 billion in assets on behalf of almost 2.9 million members, with over \$130 billion invested in Australian companies and assets.

We offer super and pension accounts as well as transition to retirement (TTR) options. Members can choose from 11 different investment options.

More information about who we are and how we are working to deliver for members is available in our **FY22 Annual Report**.

### Fund structure

AustralianSuper Pty Ltd is the trustee of AustralianSuper, a public offer superannuation fund, and manages the Fund's operations and investment activity on behalf of members. The Trustee holds an RSE Licence from the Australian Prudential Regulation Authority (APRA) which authorises it to act as the trustee of AustralianSuper.

In addition, AustralianSuper Pty Ltd has established a number of wholly owned and controlled investment vehicles also known as separate legal entities (SLEs), usually in the form of unit trusts with proprietary limited trustee companies. These SLEs have been established for the purpose of holding specific property, infrastructure, private equity, private credit and fixed income investments in the investment portfolio. These SLEs do not employ any staff and are governed by AustralianSuper Pty Ltd's policies and procedures.

<sup>1</sup> Willis Towers Watson, Thinking Ahead Institute and Pensions & Investment joint study, Global top 300 pension funds, September 2022. AustralianSuper ranked 20th out of 300 global funds.  
<sup>2</sup> Source: Australian Bureau of Statistics (Labour force) and AustralianSuper (super guarantee contributing members), June 2022.





### SLE reporting entities

For the purposes of the Modern Slavery Act, a number of these entities were classified as legal reporting entities for the 2021-2022 financial year. Refer to Figure 1.

### Consultation process

AustralianSuper has a cross functional Modern Slavery Working Group comprising representatives from the Group Risk, Legal, Investments, Procurement, Third-Party Risk, Operational Due Diligence and Corporate Affairs functions. The Working Group is involved in preparing the Fund's Modern Slavery statement and co-ordinating its review by members of the Fund's senior leadership team. The Statement is endorsed by the Risk and Compliance Committee, which oversees the Fund's risk management strategy, and ultimately approved by the Board. Throughout the year, the Working Group members share their insights and learnings with each other and consult with other teams across the Fund to drive improvements in our approach to managing modern slavery risks in our investments and operations.

We consulted with the SLEs, primarily through the Company Secretary of these entities, on the preparation of this statement.

As the SLEs are wholly owned entities, governed by the same policies and procedures as AustralianSuper Pty Ltd, all content in this statement should be read as applying to these entities.

### Fund operations and supply chain

AustralianSuper directly employs 1,321 team members as at 30 June 2022.<sup>1</sup> AustralianSuper recruits and employs the majority of its staff directly, rather than through external agencies or labour-hire arrangements. Headquartered in Melbourne, Australia, the Fund also has offices in Adelaide, Brisbane, Darwin, Hobart, Perth, Sydney, Beijing, London, and New York. Refer to Figure 2.

The Fund's main focus is the day-to-day running of the investment portfolio and member-related functions. We procure a range of goods and services from external providers to undertake our operations.

In FY22, we worked with more than 900 suppliers from 21 countries across our operational and investment activities. Our top 43 suppliers made up 80% of our spend.

By country, approximately 72% of our spend was with suppliers based in Australia, approximately 12% based in the United Kingdom and just under 10% based in the United States.

By category, administration and custodian services represented approximately 41% of our total spend, technology services represented approximately 19%, and people, professional and consulting services represented approximately 15%.

Figure 1: SLE reporting entities

FY22 reporting separate legal entities (SLEs)	ABN
AS Infrastructure No. 1 (Holding) Pty Ltd as trustee for AS Infrastructure No. 1 (Holding) Trust	97 829 937 789
AS Infrastructure No. 2 (Holding) Pty Ltd as trustee for AS Infrastructure No. 2 (Holding) Trust	42 643 099 427
AS Infrastructure No. 3 (Holding) Pty Ltd as trustee for AS Infrastructure No. 3 (Holding) Trust	89 979 226 084
AS Infrastructure No. 3 (Operating) Pty Ltd as trustee for AS Infrastructure No. 3 (Operating) Trust	61 195 183 925
AS Infrastructure WestConnex (Holding) Pty Ltd as trustee for AS Infrastructure WestConnex (Holding) Trust	96 789 213 059
AustralianSuper Investments Pty Ltd as trustee for AustralianSuper Investments Fund No. 2	52 933 108 120
AustralianSuper Investments Pty Ltd as trustee for AustralianSuper Investments Fund No. 3	27 817 108 058
AustralianSuper RAAD Pty Ltd as trustee for AustralianSuper RAAD Trust	24 644 589 250
AS International Fixed income Pty Ltd as trustee for AS International Fixed Income Trust	32 746 499 754

Figure 2: Workforce by location

As at 30 June 2022

Country	Location	Staff
Australia	Melbourne, Sydney, Brisbane, Perth, Adelaide, Hobart, Darwin, Newcastle	1,257
China	Beijing	2
UK	London	55
USA	New York	7
<b>Total</b>	<b>—</b>	<b>1,321</b>

<sup>1</sup> Includes 16 day-rate contractors and 128 maximum term contract colleagues. In addition, the Fund has 156 consultants.



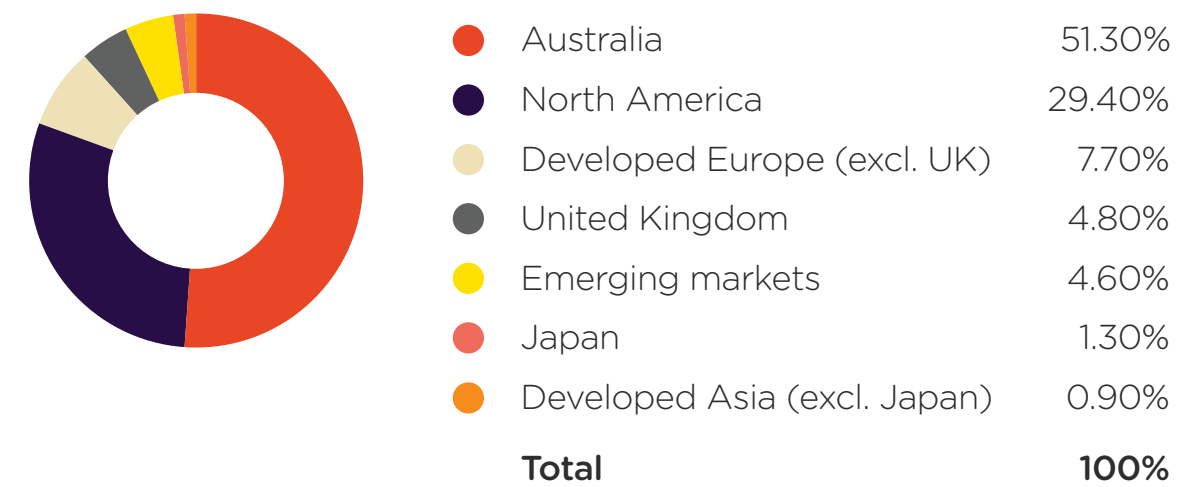
## Our investment capability

AustralianSuper invests across a variety of asset classes, sectors and geographies.

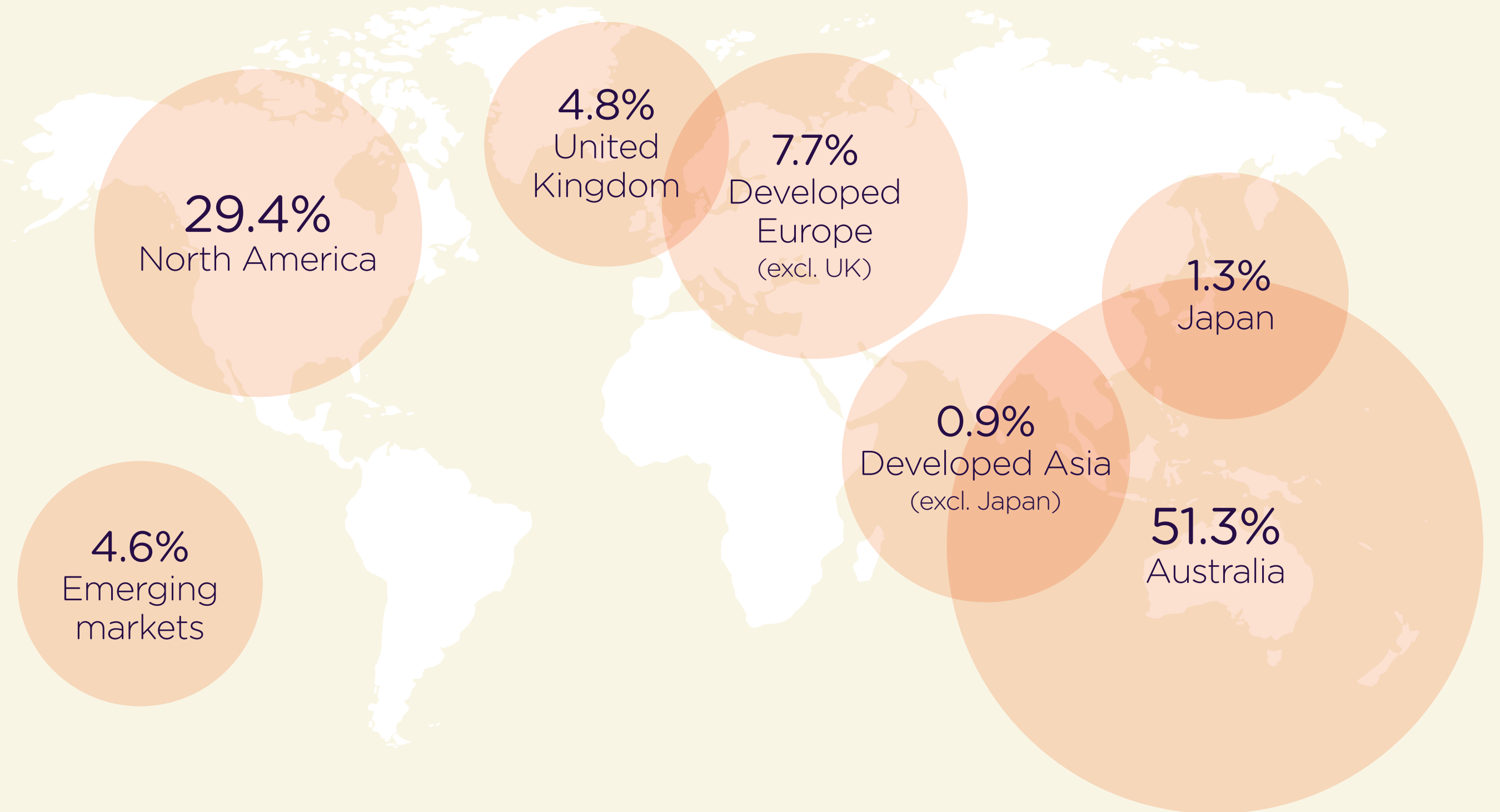
AustralianSuper invests across a variety of asset classes, sectors and geographies. We invest both internally through our in-house investment team and externally through investment managers who run discrete portfolios on behalf of AustralianSuper or pooled investment vehicles.

The following charts provide a breakdown of the investment portfolio by asset class and geographic region.

We offer a choice of investment options, with more than 90% of members investing in our default Balanced option.



**Total member assets by geographic region**  
as at 30 June 2022



**Regional breakdown by location**

Emerging markets: Argentina, Brazil, Chile, China, Colombia, Czech Republic, Egypt, Greece, Hungary, India, Indonesia, Israel, Malaysia, Mexico, Oman, Pakistan, Peru, Philippines, Poland, Qatar, Romania, Russia, Slovenia, South Africa, South Korea, Taiwan, Thailand, Turkey, UAE, Vietnam.

Developed Europe: Austria, Belgium, Cyprus, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, Malta, Netherlands, Norway, Portugal, Spain, Sweden, Switzerland.

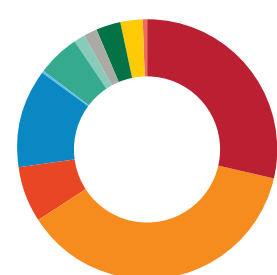
Developed Asia: Hong Kong, Macao SAR China, New Zealand, Singapore.





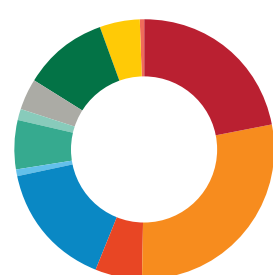
**Asset allocation of AustralianSuper investment options (accumulation)**  
as at 30 June 2022

**High Growth**



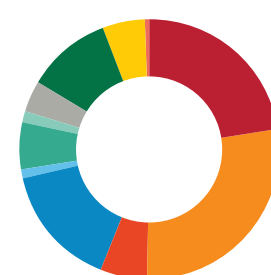
- Australian shares 28.8%
- International shares 37.1%
- Private equity 6.9%
- Unlisted infrastructure 12.5%
- Listed infrastructure 0.2%
- Unlisted property 5.3%
- Listed property 1.3%
- Credit 1.6%
- Fixed interest 3.2%
- Cash 2.7%
- Other assets 0.4%

**Balanced**



- Australian shares 22.1%
- International shares 28.4%
- Private equity 5.8%
- Unlisted infrastructure 15.5%
- Listed infrastructure 0.9%
- Unlisted property 5.9%
- Listed property 1.5%
- Credit 3.8%
- Fixed interest 10.7%
- Cash 4.8%
- Other assets 0.5%

**Socially Aware**



- Australian shares 22.5%
- International shares 27.8%
- Private equity 5.9%
- Unlisted infrastructure 15.5%
- Listed infrastructure 0.9%
- Unlisted property 6.0%
- Listed property 1.5%
- Credit 3.8%
- Fixed interest 10.6%
- Cash 5.2%
- Other assets 0.5%

**Conservative Balanced**



- Australian shares 15.4%
- International shares 19.7%
- Private equity 5.0%
- Unlisted infrastructure 12.9%
- Listed infrastructure 0.7%
- Unlisted property 6.1%
- Listed property 1.1%
- Credit 5.7%
- Fixed interest 25.1%
- Cash 8.3%
- Other assets 0.0%

**Stable**



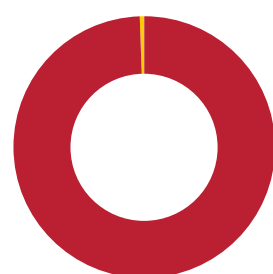
- Australian shares 8.3%
- International shares 10.5%
- Private equity 2.0%
- Unlisted infrastructure 12.3%
- Listed infrastructure 0.7%
- Unlisted property 6.4%
- Listed property 0.4%
- Credit 5.5%
- Fixed interest 31.1%
- Cash 22.8%
- Other assets 0.0%

**Indexed Diversified**



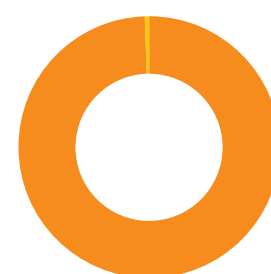
- Australian shares 28.4%
- International shares 41.5%
- Listed infrastructure 0.0%
- Listed property 0.0%
- Fixed interest 25.1%
- Cash 5.0%

**Australian Shares**



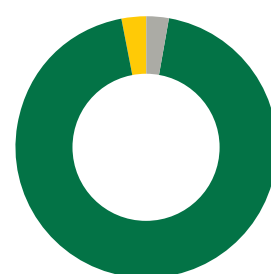
- Australian shares 99.5%
- Cash 0.5%

**International Shares**



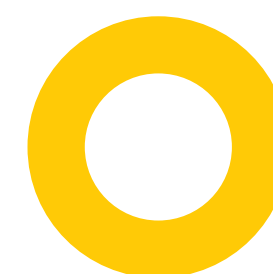
- International shares 99.5%
- Cash 0.5%

**Diversified Fixed Interest**



- Credit 2.9%
- Fixed Interest 94.3%
- Cash 2.8%

**Cash**



- Cash 100%

**In FY22, we continued to internalise our investment capability.**

By expanding our internal investment capability, we contribute to better investment performance outcomes by improving our ability to oversee and efficiently manage the portfolio. It also provides us with greater influence over ESG factors, including our ability to integrate and manage modern slavery risks in our investment decision-making and asset ownership processes. More than 50% of members' assets are now managed directly by our internal investment teams.<sup>1</sup> We expect this to grow to over 60% over the medium term.

We value transparency in our investment activities and believe it's important for members to understand what they are invested in. AustralianSuper publishes a list of the holdings in each investment option twice a year on our [website](#). Our **FY22 Annual Report** also contains a list of our investment managers at 30 June 2022.

<sup>1</sup> As at 30 June 2022.





**Criterion 3**

# Identifying modern slavery risks

When looking to assess modern slavery risk, it is important to take a ‘risk to people’ approach.

**What is modern slavery risk?**

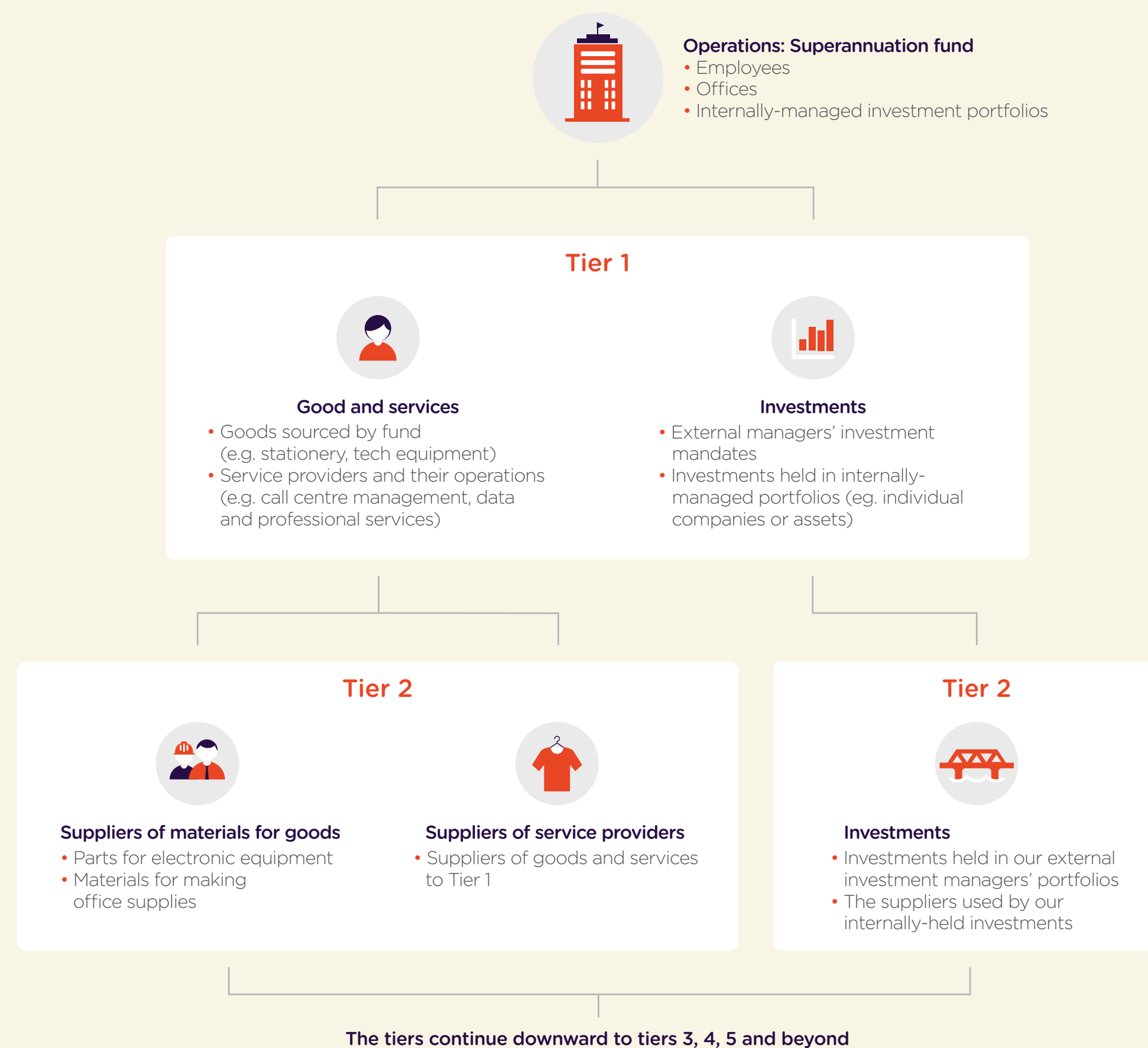
The term modern slavery describes situations where coercion, threats or deception are used to severely exploit victims and undermine their freedom.<sup>1</sup> While modern slavery manifests in different ways, the eight types of serious exploitation that are of focus for the Modern Slavery Act and AustralianSuper are: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.<sup>2</sup> The worst forms of child labour are defined as situations where children are subjected to slavery or similar practices or engaged in hazardous work.<sup>2</sup>

When looking to assess modern slavery risk, it is important to take a ‘risk to people’ approach. This means that we are looking at the severity of modern slavery practices, the likelihood of them occurring, and the extent of the risk in terms of the number of people affected and over what time period.

For AustralianSuper, this means that our risk analysis does not necessarily focus on the most material parts of our business or the risk to AustralianSuper’s business. Rather, we focus on areas of the business, supply chain and investments where the risk is highest for individuals to be subjected to modern slavery practices, even if they are small in terms of spend or impact to the business.

When looking to understand modern slavery risk, we also need to progressively address risks deeper in our operations and supply chain. Supply chains are often discussed by describing ‘tiers’ or layers to the supply chain. Figure 3 shows an example of a superannuation fund supply chain and the different tiers.

Figure 3: Example of a superannuation fund supply chain



<sup>1</sup> Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.  
<sup>2</sup> As defined in Article 3 of the ILO Convention (No. 182) concerning Prohibition and immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999.





## How we identify modern slavery risks

Embedded within AustralianSuper's Enterprise Risk management framework is a suite of policies which enable the management of modern slavery risks.

### Policy framework

AustralianSuper's Enterprise Risk management framework (ERmf) is the totality of systems, structures, policies, processes and people within the business operations that identify, assess, manage, mitigate and monitor all internal and external sources of inherent risk that could have a material impact on AustralianSuper's business operations or purpose. Embedded within the ERmf is a suite of policies which enable the management of modern slavery risks in our operations and investment portfolio. The Fund's Code of Conduct, Third-Party Management Framework (TPMF), Outsourcing Policy and ESG and Stewardship Policy set out mechanisms designed to ensure safe and compliant labour practices occur in the organisation and are assessed in our investment decision-making. Further detail on how our TPMF helps us to identify modern slavery risks in our supply chains is set out below.

Our Whistleblower Policy applies to staff, contractors and suppliers, helping to ensure that we capture and escalate grievances throughout our supply chain.

In addition, the Fund's Whistleblower Policy provides mechanisms to allow 'improper conduct', which includes breaches of the law, breaches of AustralianSuper's policies and/or any other misconduct or improper state of affairs, to be escalated and addressed through the proper governance mechanisms at the Fund. Our Whistleblower Policy applies to staff, contractors and suppliers, helping to ensure that we capture and escalate grievances throughout our supply chain.

### Procurement supply chain

In FY22, the Procurement function implemented the Fund's TPMF to standardise our supplier risk management practices, including those related to modern slavery. The TPMF defines the policies, standards, systems, processes and people required for a holistic approach to supplier risk management.

The TPMF includes a Third-Party Management Standard (TPM Standard) which sets out the minimum rules and requirements that all colleagues must follow when engaging and/or dealing with suppliers to ensure there are effective and efficient risk identification, management and monitoring processes in place over the entire end-to-end procurement lifecycle. The requirements under the TPM Standard apply to all new supplier engagements. For existing supplier arrangements, the TPM Standard has been implemented in stages, with initial focus on AustralianSuper's material and critical suppliers.

The implementation of the TPMF included the roll out of a Third-Party Arrangement Inherent Risk Profile Tool (IRP Tool) to help business functions identify inherent modern slavery risks associated with their

supplier arrangements. The IRP Tool is required for all new goods and services AustralianSuper procures and must be completed before any contract is entered into. The IRP Tool leverages the following indicators to help identify if poor labour practices, human rights abuses and modern slavery are inherent risks in a supplier arrangement:

- **High risk business models:** Business models that rely on unskilled, temporary or seasonal workers or any offshore workers.
- **High risk industry sectors:** Products and services regarded as having more significant inherent modern slavery risk - including industries that rely heavily on low-skilled labour and/or involve dangerous work.
- **High risk countries:** Countries which are known to have higher human rights (and modern slavery) risks.

Based on the indicators, the IRP Tool informs the level of due diligence and assessment required as part of the supplier selection and engagement process. The inherent risk assessment questions the country of origin of the supplier and the industry and calculates a slavery index score which triggers the need to ask further questions of the supplier to assess whether there is any modern slavery risk. To support the due diligence process, the Fund formed a Third-Party Risk Oversight and Due Diligence team (TPRO) in FY22. This team is part of a broader first line risk and compliance team reporting into the Chief Operating Officer.





### Existing supplier modern slavery assessment

In FY22, we extended the modern slavery risk assessment program undertaken by external service provider FairSupply to our existing suppliers. The assessment provides indicative levels of modern slavery risk in our supply base by geography, industry and the depth of the risk within our supply chain. This information allows us to validate the indicators we have set to identify modern slavery risks and better target our due diligence activities.

The FairSupply assessment indicated that, while the majority of our modern slavery risk exists in Tiers 2, 3 and 4 of our supply chain, our overall risk is low. This is largely due to the predominance of our suppliers being based in Australia, the United States and the United Kingdom, and being in the financial service and professional and technology consulting service industries.

### Investment portfolio

In the investment portfolio we seek to identify modern slavery risks by integrating ESG factors in the investment process. This includes analysing material social factors including supply chain, labour and modern slavery risks. We assess modern slavery risks for our internally managed investments prior to buying assets and on an ongoing basis throughout the ownership

phase. For externally managed assets, we assess how new and existing investment managers identify and mitigate modern slavery issues through our appointment and annual operational due diligence processes.

As part of our assessment, we take into consideration the geographic locations of the investment and its supply chain, industry exposure and the nature of the business' workforce to identify potential risks. Our assessment of these areas has been informed by such guiding frameworks as the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, The Global Slavery Index, and UN Guiding Principles on Business and Human Rights.

### Modern slavery risk assessment

In FY22, we expanded our FairSupply modern slavery risk assessment of the investment portfolio to include the Fund's unlisted infrastructure and property assets. This analysis builds on the FY21 assessment of our Australian and international listed shares portfolios, which is detailed in our **FY21 Modern Slavery Statement**. We have not repeated the assessment of our listed shares portfolio in FY22.

We have progressively expanded our modern slavery risk assessments across our investment portfolio. This approach has

been useful in identifying the portfolio's modern slavery risks and helping us to determine the actions required to mitigate risks through our ESG and Stewardship program. Going forward, we intend to conduct periodic assessments of our portfolios to monitor our modern slavery risk exposure.

### Unlisted infrastructure and property portfolios

Our FY22 risk assessment analysed our unlisted infrastructure and property portfolios' inherent modern slavery risk from Tier 1 (direct supplier) down to tier 10 of the supply chain, covering both internally and externally managed exposures (excluding property assets under development). The analysis classifies modern slavery risks according to the three UN Guiding Principles continuum of conduct categories: cause, contribution and direct linkage.<sup>1</sup>

FairSupply's assessment indicates the risk of modern slavery occurring in each portfolio, enabling us to identify the top modern slavery risks by geography, industry and company. While the analysis highlights where risks could potentially emerge from within a company's supply chain, it does not indicate the actual prevalence of modern slavery practices in these companies. It also does not take into

account the mitigation strategies each asset and company have in place to manage modern slavery risks.

AustralianSuper has used a slavery intensity metric to identify modern slavery risk across our portfolios. The 'slavery intensity' metric quantifies the number of Full-Time Equivalent (FTE) workers estimated to be in slavery across the portfolio's supply chain per million dollars invested. We have used the 'slavery intensity' metric to identify risk across our portfolios as we understand that while we may have more proportionate influence over those investments where a higher amount is invested, the risk to people of modern slavery can also occur in our smaller value investments.

The following provides a summary of the FairSupply assessment for our internally and externally managed infrastructure and property portfolios. The analysis identified that the internally managed infrastructure portfolios had an elevated risk of modern slavery compared to the other unlisted portfolios shown below. The portfolios reported below have a lower modern slavery risk in their supply chains than the listed shares portfolios reported in our **FY21 Modern Slavery Statement**.

<sup>1</sup> Australian Border Force (2018) Guidance for Reporting Entities, pg. 40.





## Infrastructure portfolio – internal

### Supply chain risk

Figure 4 shows the slavery intensity for each tier in the supply chain in the internal infrastructure portfolio. It is calculated by summing the estimated number of FTE estimated to be in slavery along the supply chains of each asset in the portfolio. As the chart shows, the highest risk of modern slavery in the portfolio is in Tier 3 of the supply chain, with risk in Tier 1 relatively low.

AustralianSuper invests in a broad range of infrastructure assets across global markets, including investments in airports, seaports and roads. These assets have a higher risk of modern slavery due to their geographical location and industries in which they operate. The FairSupply assessment found that the greatest risk in the supply chain is in Tier 3 within transportation assets. We are also aware that capital works in infrastructure assets often rely on a low-skilled, vulnerable workforce such as construction workers. The vulnerability of workers to modern slavery in industries, such as construction and agriculture, has increased in recent years due to the COVID-19 pandemic.

### Risk by industry

Figure 5 shows the top five industries which present the highest modern slavery risks within the supply chains of the internal infrastructure portfolio. To calculate the industries which present the most significant risks to the portfolio’s risk of slavery, the analysis takes into consideration the value of our investment moving throughout the supply chain. This is conducted at an industry level so that we can use our proportionate influence to address modern slavery with investee companies in the industries with an elevated risk of slavery.

### Risk by country

Figure 6 shows the top five countries which present the highest modern slavery risks in the internal infrastructure portfolio’s supply chain. While developed countries such as Great Britain and Australia have a nominally lower risk than the top three countries shown below, the analysis demonstrates that developed countries are not immune to modern slavery risks.

Figure 4: Supply chain risk by tier  
Infrastructure portfolio – internal

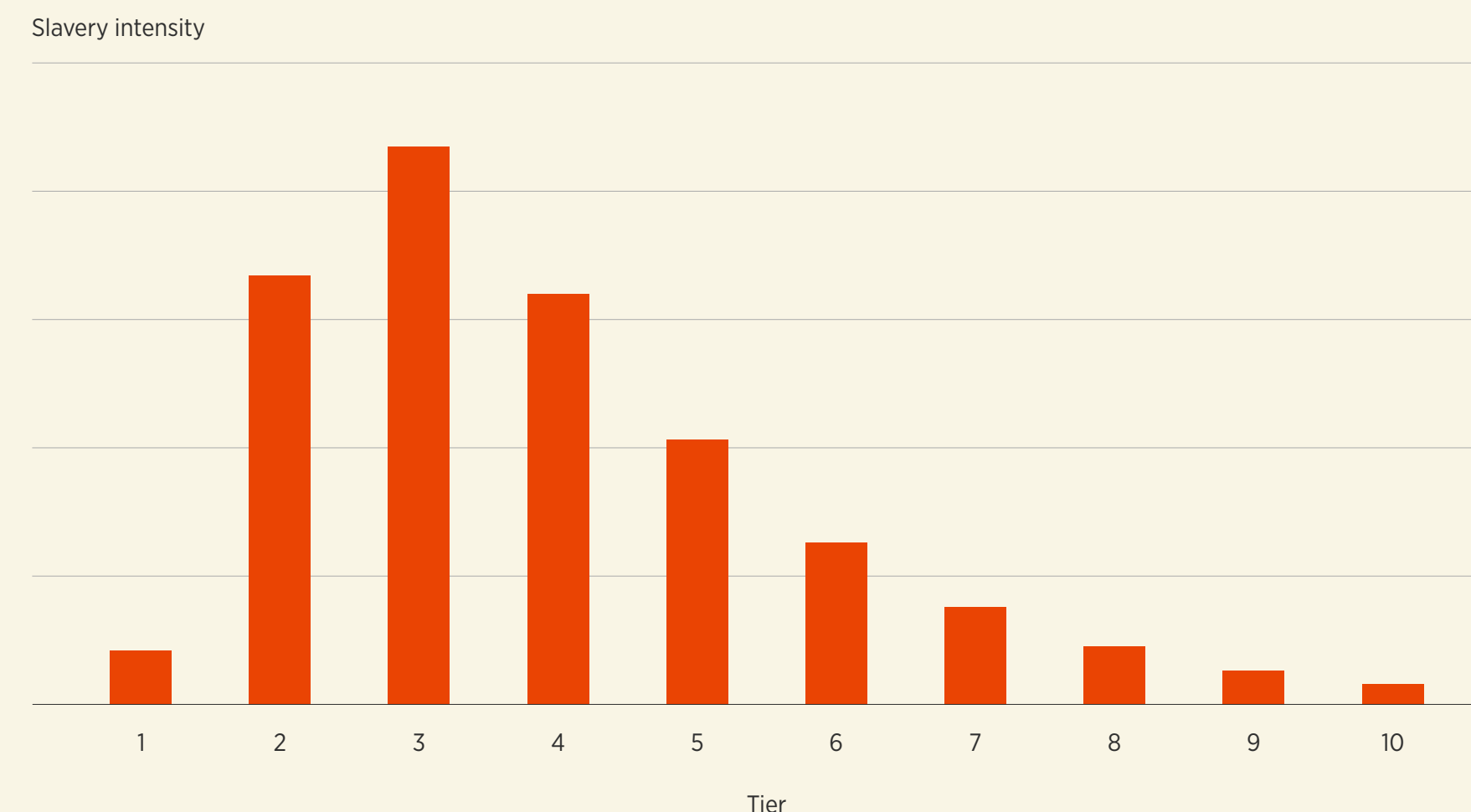


Figure 5: Top industry modern slavery risks  
Infrastructure portfolio – internal

Top industry modern slavery risks
Papua New Guinean wholesale trade
Papua New Guinean education, health and other services
Tanzanian agriculture
Papua New Guinean transport
USA

Figure 6: Top country modern slavery risks  
Infrastructure portfolio – internal

Top country modern slavery risk
India
China
Papua New Guinea
Great Britain
Australia

Sources: FairSupply Modern Slavery Risk Analysis. Portfolio data at 31 December 2021. Portfolio data at 31 December 2021. This analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Act. No information confirms the actual existence or non-existence of slavery in AustralianSuper’s supply chains, operations or investments. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.





## Infrastructure portfolio – external

### Supply chain risk

Figure 7 shows the slavery intensity for each tier in the supply chain in the externally managed infrastructure portfolio. It is calculated by summing the estimated number of FTE estimated to be in slavery along the supply chains of each asset in the portfolio. As the chart shows, the highest risk of modern slavery in the portfolio is in Tier 1 of our external managers' assets.

### Risk by industry

Figure 8 shows the top five industries which present the highest modern slavery risks within the supply chains in the externally managed infrastructure portfolio's supply chain. The risk by industry has been calculated using the same method outlined directly above Figure 3. The services to finance and investment industry below includes facilities, cleaning and security services, which can be susceptible to modern slavery risks due their more vulnerable workforce.

### Risk by country

Figure 9 shows the top five countries which present the highest modern slavery risks in the externally managed infrastructure portfolio's supply chain.

Figure 7: Supply chain risk by tier  
Infrastructure portfolio – external

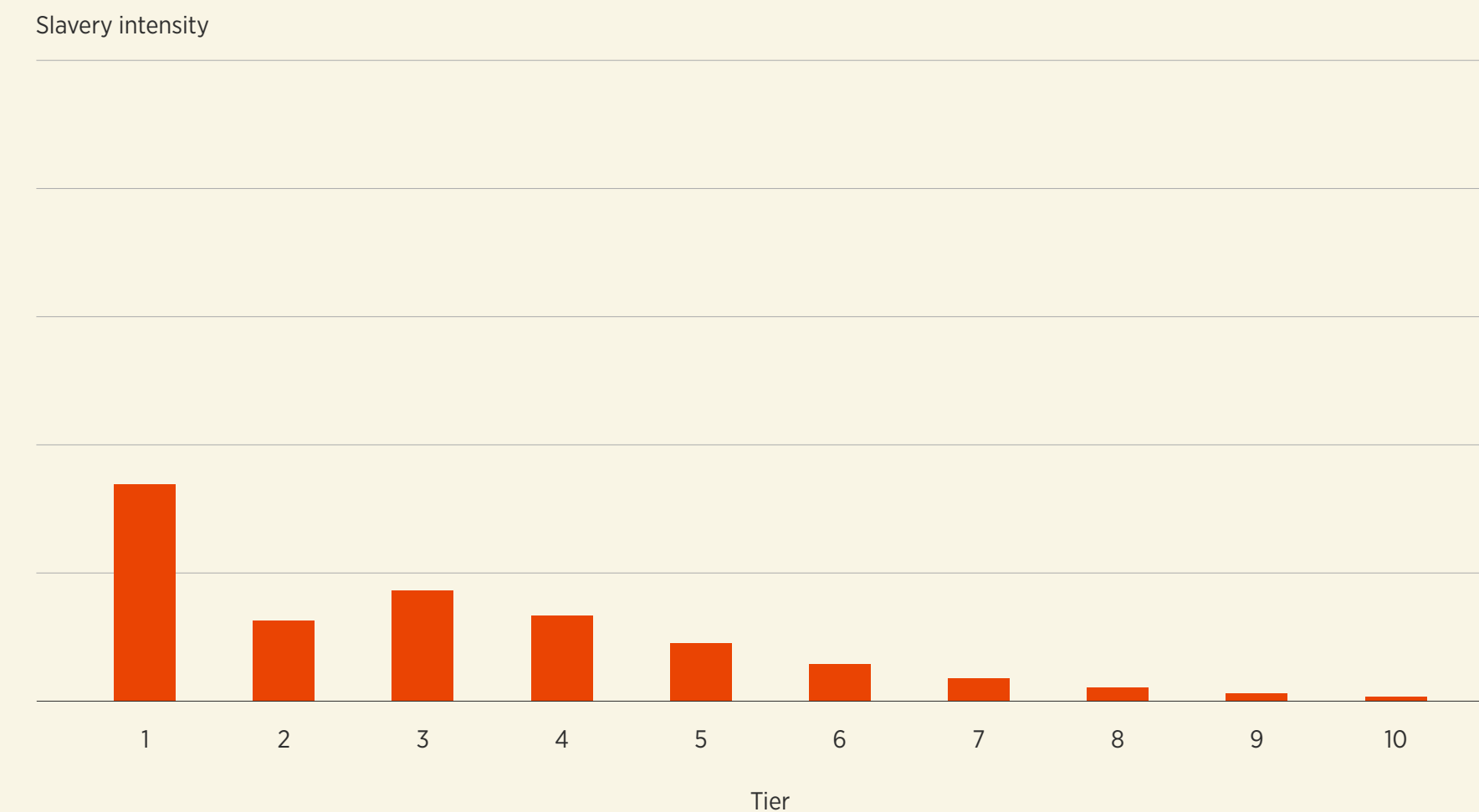


Figure 8: Top industry modern slavery risks  
Infrastructure portfolio – external

Top industry modern slavery risks
Indian insurance
Indian other crops
Australian services to finance and investment
Indonesian finance and insurance
USA

Figure 9: Top country modern slavery risks  
Infrastructure portfolio – external

Top country modern slavery risk
India
China
Australia
Papua New Guinea
Indonesia

Sources: FairSupply Modern Slavery Risk Analysis. Portfolio data at 31 December 2021. Portfolio data at 31 December 2021.  
This analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Act. No information confirms the actual existence or non-existence of slavery in AustralianSuper's supply chains, operations or investments. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.





## Property portfolio – internal

### Supply chain risk

Figure 10 shows the slavery intensity for each tier in the supply chain in the internal property portfolio. It is calculated by summing the estimated number of FTE estimated to be in slavery along the supply chains of each asset in the portfolio. The property portfolio has a low modern slavery footprint with the highest risk of modern slavery in Tier 2 of the supply chain.

### Risk by industry

Figure 11 shows the top five industries which present the highest modern slavery risks within the internal property portfolio’s supply chain. The risk by industry has been calculated using the same method outlined directly above Figure 3. The construction and maintenance sectors are higher risk as they typically rely on a low-skilled, migrant workforce who are more vulnerable to modern slavery risks.

### Risk by country

Figure 12 shows the top five countries which present the highest modern slavery risks in the internal property portfolio’s supply chain.

Figure 10: Supply chain risk by tier  
Property portfolio – internal

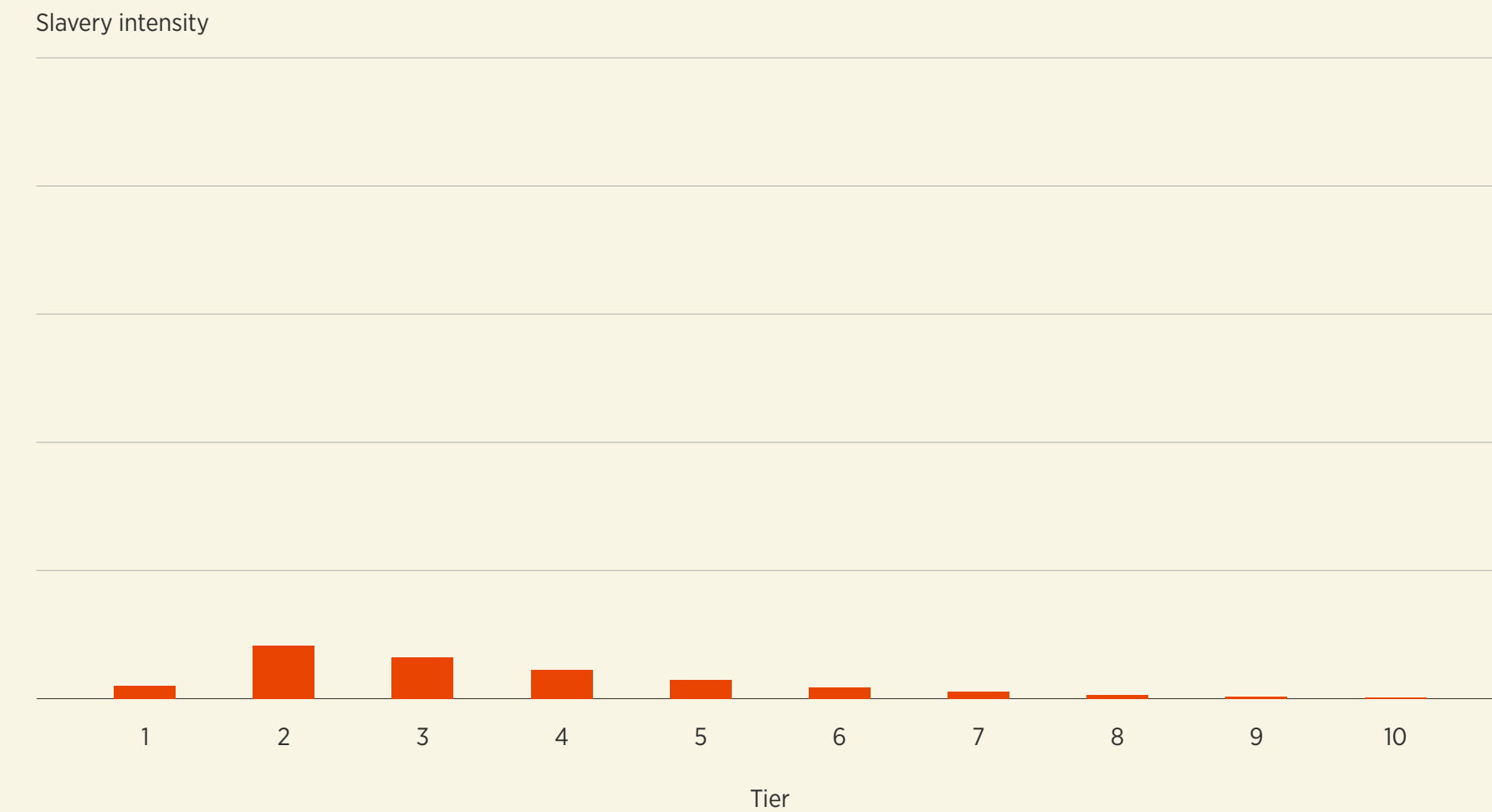


Figure 11: Top industry modern slavery risks  
Property portfolio – internal

Top industry modern slavery risks
Papua New Guinean wholesale trade
Papua New Guinean education, health and other services
Tanzanian agriculture
Papua New Guinean transport
USA

Figure 12: Top country modern slavery risks  
Property portfolio – internal

Top country modern slavery risk
India
China
Papua New Guinea
Great Britain
Australia

Sources: FairSupply Modern Slavery Risk Analysis. Portfolio data at 31 December 2021. Portfolio data at 31 December 2021.  
This analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Act. No information confirms the actual existence or non-existence of slavery in AustralianSuper’s supply chains, operations or investments. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.





## Property portfolio – external

### Supply chain risk

Figure 13 shows the slavery intensity for each tier in the supply chain in the externally managed property portfolio. It is calculated by summing the estimated number of FTE estimated to be in slavery along the supply chains of each asset in the portfolio. The property portfolio has a low modern slavery footprint with the highest risk of modern slavery in Tier 3 of the supply chain.

### Risk by industry

Figure 14 shows the top five industries with modern slavery risks in the externally managed property portfolio’s supply chain. The risk by industry has been calculated using the same method outlined directly above Figure 3. These industries typically rely on unskilled, migrant workers are more vulnerable to modern slavery risks.

### Risk by country

Figure 15 shows the top five countries which present the highest modern slavery risks in the externally managed property portfolio’s supply chain.

Figure 13: Supply chain risk by tier

Property portfolio – external

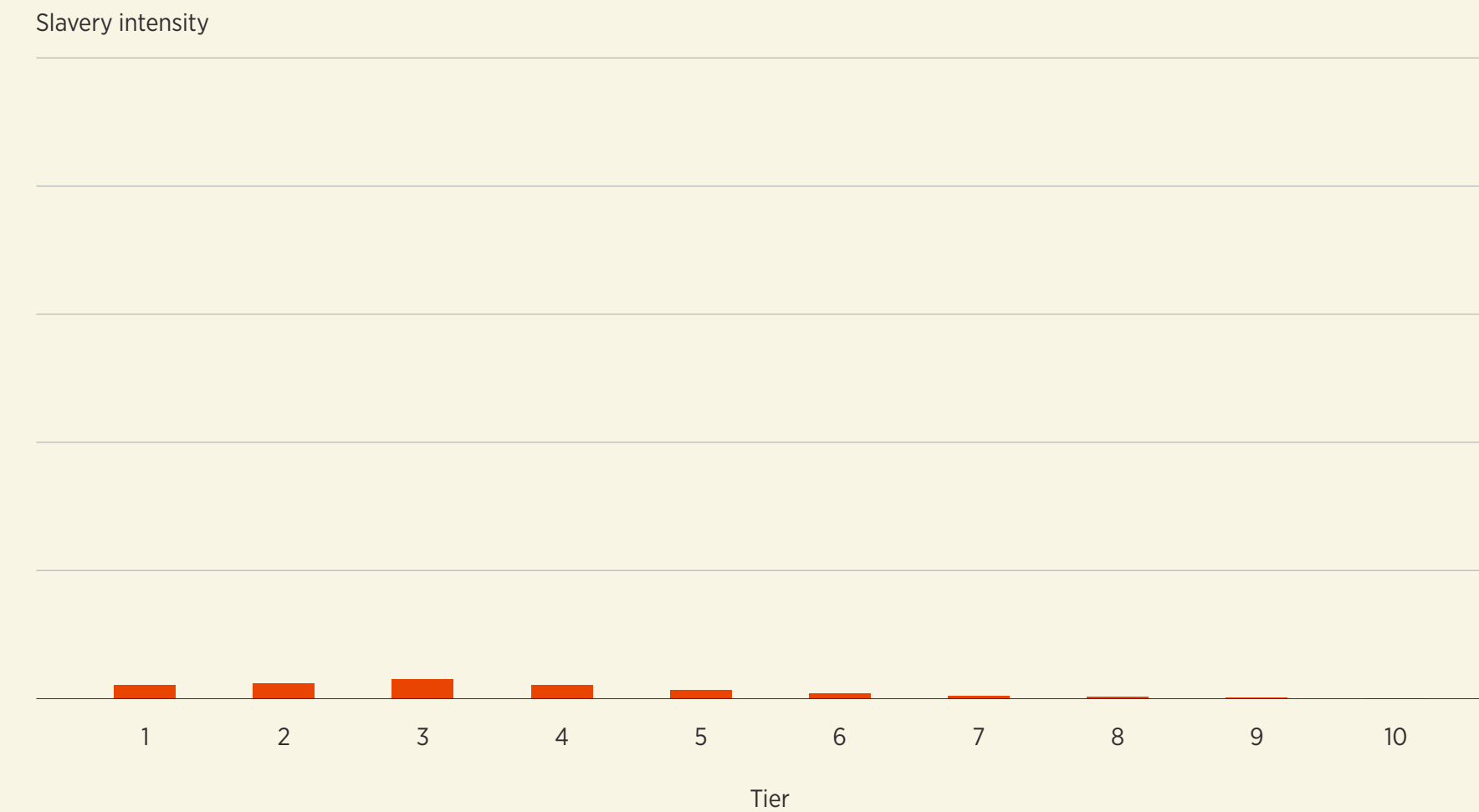


Figure 14: Top industry modern slavery risks

Property portfolio – external

Top industry modern slavery risks
Australian hotels, clubs, restaurants and cafes
Australian hospitals and nursing homes
Indian other crops
Australian accommodation
Papua New Guinean education, health and other services

Figure 15: Top country modern slavery risks

Property portfolio – external

Top country modern slavery risk
Australia
India
China
Thailand
Papua New Guinea

Sources: FairSupply Modern Slavery Risk Analysis. Portfolio data at 31 December 2021. Portfolio data at 31 December 2021. This analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Act. No information confirms the actual existence or non-existence of slavery in AustralianSuper’s supply chains, operations or investments. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level..





#### Criterion 4

## Assessing and addressing modern slavery risks

We assess the risk of our direct company operations directly causing or contributing to modern slavery to be low.

We assess the risk of our direct company operations directly causing or contributing to modern slavery to be low. This assessment is based on an understanding of the nature of our workforce and geographic footprint. AustralianSuper's offices are mainly located in developed markets with largely professional, office-based, permanent staff. All full-time or part-time permanent employees and maximum term contract staff are covered by an enterprise agreement that sets out labour entitlements that further mitigate the risk of modern slavery occurring in our operations. The policies we have in place as outlined in this statement also reduce our modern slavery risk profile.

In addition, as described in the previous section, we have conducted an independent assessment of our investment and third-party supplier supply chains through Fair Supply. This assessment indicated that our overall modern slavery risk in our procurement supply chain was low. It identified key risks associated with some components of the investment portfolio which may be exposed to higher-risk industries or suppliers from high-risk countries or through more remote parts of their supply chains. We have provided an overview of the results of this assessment for both our existing suppliers and our property and infrastructure investment portfolios in this statement. Our previous assessment of our listed shares portfolio is detailed in our **FY21 Modern Slavery Statement**.







### Responsible procurement

The Procurement function has implemented a standardised and risk-weighted approach to supply chain risk assessment and management. The approach, which is defined in our Third-Party Management Framework and Standard, involves the segmentation of our suppliers based on inherent risks and contract value. This then informs our business functions on how to assess, manage and monitor those risks. Where labour practices, human rights abuses and modern slavery is identified as an inherent risk to a supplier arrangement through the IRP Tool, our Fund colleagues are required to:

- conduct additional due diligence to ensure suppliers have suitable management systems in place to manage labour, human rights and modern slavery risks associated with their operations. The due diligence process requires the supplier to complete a due diligence questionnaire that includes questions relating to the supplier's:
  - modern slavery policies and procedures
  - site/facility locations
  - supply chain management practices
  - known modern slavery risk, and
  - other risk factors.

- ensure supplier contracts include appropriate terms and conditions which set out obligations relating to the management of labour practices, human rights and modern slavery risks. These obligations include requirements to implement policies and procedures to ensure compliance with modern slavery laws, report identified modern slavery risks or events to AustralianSuper, keep records in relation to the supplier's modern slavery practices and provide AustralianSuper with that information; and
- monitor and manage labour practices, human rights and modern slavery risk over the life of the contract. Supplier arrangements with identified inherent risks are required to have contract and supplier monitoring plans in place and complete an annual due diligence review.

Supplier responses to the due diligence questionnaire are assessed by the TPRO team to identify potential modern slavery issues in the supplier's operations that would require further investigation or escalation.

Our Third-Party Management Framework and Standard involves the segmentation of our suppliers based on inherent risks and contract value to inform our business functions on how to assess, manage and monitor those risks.

Where any modern slavery risks are identified, these are assessed and recorded in our risk system for management, monitoring and reporting.

The TPRO team is responsible for the design and ongoing implementation of the due diligence program, residual risk assessments and assignment of controls for third-party risk management.







## Investments

### Unlisted assets

Our Environmental, Social and Governance (ESG) due diligence process provides a foundation for identifying modern slavery risks in the Fund's directly held unlisted assets, and we seek to manage these risks through our ongoing asset management practices.

This process involves assessing unlisted assets or companies based on the materiality of the key ESG risks and opportunities, including modern slavery. As a starting point, we use our internally developed ESG risk matrix to identify the materiality of each risk for each asset. We then assign a risk rating to each risk based on the likelihood of it occurring and its valuation impact.

Once we own a property or infrastructure asset, we conduct periodic ESG specific engagements as part of our stewardship approach. During these reviews, AustralianSuper engages directly with the management teams of the asset and specifically addresses how they're tackling modern slavery risks in their operations and supply chains. This involves a primary review of assets' modern slavery statements, and at the asset level, we delve into the availability and robustness of grievance mechanisms in place, codes of conduct and training in place, contractor oversight, and procurement processes.

AustralianSuper has commenced an ESG training program for non-executive directors of our larger, directly held unlisted assets. The program includes a dedicated session on modern slavery and is being rolled out to internal staff during FY23.

### Listed shares

We expect companies to effectively identify and manage modern slavery risks across their supply chains. For Australian listed companies, we have a direct engagement program where we discuss the company's approach to ESG. Modern slavery and labour standards are priority areas of the social factor component of our direct engagement program.

In FY22, we held 75 direct engagement meetings with ASX300 companies and have addressed modern slavery in 21% of our direct engagements. Our company engagements are informed by the findings of our initial social factor assessments, industry and country modern slavery risks identified by the FairSupply analysis and other information we have ascertained from the company's disclosure or previous engagement activities.

Our ongoing engagement with these companies focuses on enhancing performance in the priority areas we've identified with regards to modern slavery. These priorities may include enhancing

modern slavery statement disclosure, deepening relationships with suppliers to effectively enhance auditing practices, and building processes and procedures around remediation when issues are found.

As part of our investment stewardship of listed companies in FY22, we have continued to assess proposals tabled by shareholders on labour and modern slavery issues. Where we are satisfied with their merit and alignment with our expectations, we have supported resolutions. Our full voting record, including votes on different modern slavery related company resolutions, can be found on our website.

For international listed companies, our subscription to EOS at Federated Hermes grants us access to insights and opportunities regarding engagements with over 1,000 international companies annually.

**For Australian listed companies, we have a direct engagement program where we discuss the company's approach to ESG. In FY22, we held 75 direct engagement meetings with ASX300 companies and have addressed modern slavery in 21% of our direct engagements.**

### External investment managers

AustralianSuper invests a proportion of members' assets through external investment managers. While AustralianSuper is not making the individual investment decisions in these circumstances, it is important that the Fund's external investment managers consider modern slavery, supply chain and labour aspects in their investment processes.

In the investment manager appointment and annual compliance operational due diligence process for all external managers, we assess how investment managers address ESG as part of their investment approach. We have enhanced our due diligence approach by implementing additional modern slavery specific questions in both our appointment due diligence and on-going compliance questionnaires, which are sent to our equities, fixed income, private equity, property and infrastructure managers on an annual basis.

We expect our external investment managers to have an established set of frameworks, policies and procedures that govern the way they operate, assess, and manage modern slavery risks and impacts. Through the ongoing compliance monitoring assessment, we seek to gain assurances that our external investment managers are performing initial and ongoing due diligence of their third parties to identify current modern slavery risks associated with operations and supply chains.

AustralianSuper conducts deep-dive ESG reviews on all its external listed equities managers via annual questionnaires. As part of these reviews, we seek to understand how the manager considers ESG factors in the investment process and more specifically, how they consider labour and supply chain factors as part of their investment decision-making. We have a modern slavery specific section to this process which includes deeper analysis into how the manager considers modern slavery in their investment decision-making.

Every year we assess our listed equities managers on their approaches to modern slavery risk assessment and mitigation in their operations and the investment portfolios managed on the Fund's behalf. We conducted this assessment again in FY22. This assessment fed into our overall view and final ESG score for the Fund's listed equities managers. These ESG scores informed our annual external manager review process where our investment team determine which managers are retained.





#### Criterion 4

## Collaborating for better outcomes

AustralianSuper understands the importance of contributing to and supporting initiatives that help peers, businesses and society better identify and mitigate modern slavery risk.

AustralianSuper understands the importance of contributing to and supporting initiatives that help peers, businesses and society better identify and mitigate modern slavery risk. In FY22, we continued our work with the Cleaning Accountability Framework (CAF) and Investors Against Slavery and Trafficking Asia-Pacific (IAST APAC).

We also continued our participation in investor forums such as The Australian Council of Superannuation Investors (ACSI) and RIAA's Human Rights Working Group. AustralianSuper is also a signatory to the Workforce Disclosure Initiative, a global initiative designed to improve corporate transparency and accountability on workforce issues and provide companies and investors with comprehensive and comparable data on workforce issues.







## Cleaning Accountability Framework

AustralianSuper co-founded the Cleaning Accountability Framework (CAF) in 2012 and is a proud supporter of the work it does to improve labour practices across cleaning supply chains.

Globally, the cleaning industry is a high-risk sector for modern slavery. In Australia, there are around 150,000 people working as cleaners, with a workforce made up of vulnerable members of the community who are more likely to be subjected to exploitation. This can materialise in forms such as underpayments (including the payment of superannuation and other mandated entitlements), income insecurity, poor working conditions, unethical contracting and procurement approaches and immigration-related threats, coercion and deception.

CAF works with cleaners and their union, tenants, contractors, property owners, facility managers, and investors across the cleaning supply chain to ensure ethical labour practices through Certification of commercial real estate assets via their 3 Star Standard. The CAF 3 Star Standard takes a multi-stakeholder approach to

ensuring that all cleaning staff are compensated according to law and that best labour practices are upheld. There are now 664 cleaners at CAF-certified sites in Australia.

During FY22, CAF Building Certifications increased by 20% and a Contractor Prequalification program was launched to assess cleaning contractors' HR management systems, policies and procedures against CAF's 3 Star Standard. More than 9,200 cleaners now form part of the CAF Prequalification universe.

CAF has also commenced developing a pilot program for CAF Portfolio Certification which will enable CAF certification of whole property portfolios, instead of the building-by-building approach currently in place. When launched to market in 2023, this is expected to substantially increase CAF's ability to positively impact cleaners on a broader scale.

With more than 72,000 AustralianSuper members employed in the cleaning industry, CAF is an important initiative for AustralianSuper. Our continued involvement is helping to improve the working conditions and environment for thousands of AustralianSuper members and other workers in the high-risk cleaning industry. As a large investor in the Australian property market, CAF certification indicates that properties are operating ethically when it comes to their labour practices, helping mitigate modern slavery risks and protecting investment value and members' outcomes in the long term.







## Investors Against Slavery and Trafficking Asia-Pacific (IAST APAC)

IAST APAC was launched in 2020 as an investor initiative to promote effective action by companies to find, fix and prevent modern slavery, labour exploitation and human trafficking across the value chain.

The initiative is creating a consistent framework and co-ordinated engagement program to allow for best practice approaches to identifying and mitigating modern slavery risk in company supply chains.

AustralianSuper is one of the founders of the initiative, which is open to investors across the APAC region for membership. The secretariat of the initiative is provided by Walk Free in partnership with the Liechtenstein Initiative for Finance Against Slavery and Trafficking (FAST). IAST APAC represents \$7.8 trillion in funds under management across 37 investors.

The initiative has two workstreams.

### Workstream 1

This workstream was set up to draft an investor statement outlining investors' expectations on modern slavery. It encouraged companies to go above and beyond the legal requirements of the Modern Slavery Act and outlined measures companies should consider adopting as best practice to combat modern slavery risks effectively.

The investor statement was sent to all the companies listed on the ASX200 in FY21. Of the responses received, almost half welcomed the investor statement and the IAST APAC initiative with at least 29 percent of the ASX200 companies committing to raising the investor statement with their Board and/or Senior Management. In FY22, Workstream 1 began to examine avenues for policy advocacy such as shaping future versions of the Modern Slavery Act by providing a submission during the Federal Government's review process.

### Workstream 2

AustralianSuper co-chairs this workstream, which is focused on collaborative engagements with specific companies on the issues raised in the investor statement. Research shows that companies operating in the Asia-Pacific region, including Australia, are particularly exposed to modern slavery risks due to the region's prominent role in the global economy. A group of 24 focus companies were selected as engagement priorities from four sectors: Consumer Discretionary, Consumer Staples, Technology and Healthcare with engagement plans developed with specific objectives and milestone targets for each company. This workstream commenced direct engagement with these companies during FY21 and FY22.

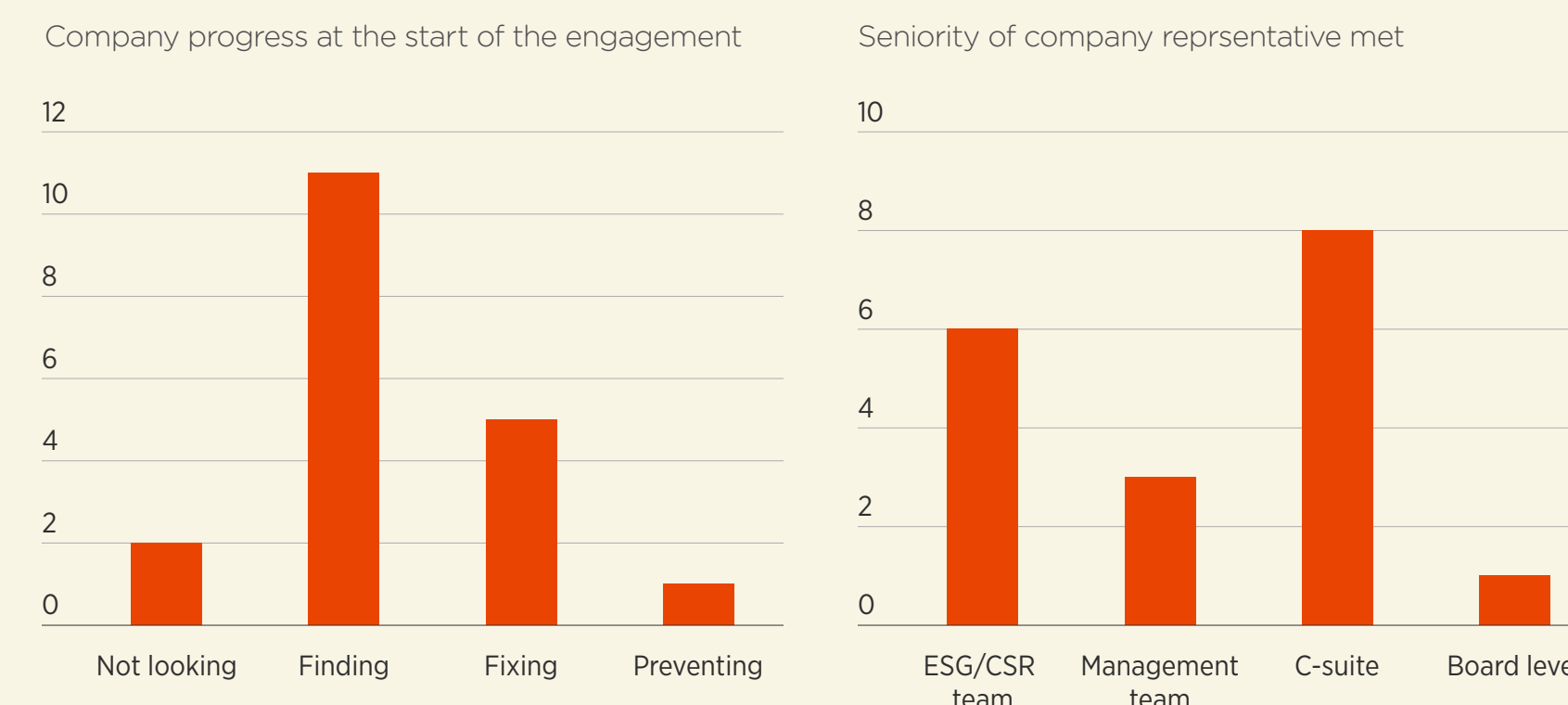
Given the breadth and variety of countries and sectors in the focus group of companies, our engagements have revealed that companies are at different stages of responding to modern slavery risks. While most companies are using tools to identify where modern slavery risk may be present, more work is required to mitigate and prevent the risk from occurring.

IAST APAC is strongly focused on industry collaboration - in the spirit of the Modern Slavery Act - including shared knowledge and tools to address risk, taking inspiration from the investor initiative 'Find it, Fix it, Prevent it' in the UK. It also engages with civil society, including Walk Free and FAST as well as investor briefings on specific risks by labour rights experts.

AustralianSuper understands the impact collaborative engagement can have on improving company performance on ESG issues. We see our ongoing involvement in IAST APAC as an important mechanism by which we can work with other investors to engage with companies on enhancing disclosure and management of modern slavery risks.

Investors Against Slavery and Trafficking Asia-Pacific represents \$7.8 trillion in funds under management across 37 investors.

Figure 16: Company progress on modern slavery



Source: Investors Against Slavery and Trafficking, Asia Pacific, Annual Report 2021-2022. For further information visit [iastapac.org](http://iastapac.org)





## Criterion 5

# Measuring the effectiveness of our actions

AustralianSuper has the following mechanisms in place to continually assess and monitor the effectiveness of our actions:

- Compliance with key AustralianSuper policies through auditing processes.
- Using the internal Modern Slavery Working Group to share insights, learnings and drive improvements.
- Periodic reviews of Fund policies, standards and procedures.
- The use of grievance mechanisms and monitoring of effective and timely remediation.
- The number of key suppliers under new modern slavery contracts and disclosure regimes and engagement with those suppliers.
- The level of disclosure garnered from suppliers on their modern slavery approaches.
- The implementation of an enhanced due diligence framework in relation to the assessment of social factors and ongoing assessment of its effectiveness before and during ownership. This includes monitoring of asset and company performance improvements on these factors.
- Continuous engagement with companies on modern slavery risks and assessing the impact of our stewardship activities, including how investee companies have evolved their approaches. Commencement of collaborative engagement with focus companies highly exposed to modern slavery risks through the Investors Against Slavery and Trafficking Asia-Pacific Initiative.
- Annual engagement with all external investment managers on their approach to modern slavery, monitoring of ESG scores and number of managers addressing modern slavery risks in their investment approach.

## Responsible Investor Ratings

AustralianSuper utilises external responsible investment surveys to assist in assessing the effectiveness of our ESG and Stewardship program, including our approach to modern slavery. We report to the UN's Principles for Responsible Investment (PRI) and the Responsible Investment Association Australasia (RIAA) each year as part of our membership of these organisations.

### Responsible Investment Leader 2022

AustralianSuper is recognised as a Responsible Investment Leader 2022 by RIAA. This acknowledges our commitment to responsible investing; our explicit consideration of environmental, social and governance factors in investment decision-making; our strong and collaborative stewardship; and our transparency in reporting activity, including the societal and environmental outcomes being achieved.







## Criterion 7

# The year ahead

Much work initiated in FY20 and FY21 continued through the Modern Slavery Working Group across the Fund in FY22. We intend to continue to expand our approach, refining processes and procedures, working with more suppliers and evolving our investment approach to further address modern slavery.

### Evolving our modern slavery approach in FY23

#### Policies and risk management

- Continuing to formalise and evolve internal controls on modern slavery.
- Evolve documentation around those key controls in the areas of Procurement and Investments.

#### Procurement and third-party risk oversight and due diligence

- Continue to embed AustralianSuper's TPME, Policies and Standards.
- Continuous improvement of tools (such as the IRP tool), systems, processes, guidance and training on third-party management and support of our business.
- Continue to work with suppliers providing goods and services to AustralianSuper to raise awareness and mitigate any potential modern slavery risks in their supply chains.
- Continue with ongoing due diligence on suppliers where required, and undertake an annual assurance program testing for compliance to the TPM Framework.

#### Investments

- Integrate findings of independent modern slavery risk assessments into property and infrastructure ownership plans and stewardship strategies for high-risk industries.
- Continue to review our ESG due diligence modern slavery processes to assure alignment with best practice.
- Continue to assess and benchmark performance on modern slavery issues of new and existing investment managers through our appointment and annual operational due diligence processes.
- Continue to evolve our approach to modern slavery with regards to overarching frameworks like the UN Sustainable Development Goals (SDGs) and the UN Guiding Principles on Business and Human Rights.
- Continuation of ESG and Modern Slavery training program roll-out to non-executive directors on our larger, directly held unlisted assets and internal staff.
- Developing asset ownership plans for companies held in our internal international equity portfolios, which identify material ESG issues such as modern slavery and set out our stewardship strategy to manage these risks for each company.

#### External collaboration

- Continued collaboration with like-minded investors for enhanced modern slavery approaches at investee companies.
- Continue to raise awareness of IAST APAC with investors and advance their advocacy activities.
- Continue to seize opportunities to advocate for advancement of modern slavery approaches in public forums.
- Monitor Federal Government's review of the Modern Slavery Act and consider opportunities to engage.





# Contact us

Member feedback is important to us. To get in touch, you can contact us in a number of ways.

## Mail address

Superannuation: **GPO Box 1901 Melbourne VIC 3001**

Retirement: **Locked Bag 6 Carlton South VIC 3053**

## Email

Email us at [australiansuper.com/email](mailto:australiansuper.com/email)

## Over-the-phone

Call us on: **1300 300 273**

Overseas callers: **+ 61 3 9067 2108**

We're available 8am to 8pm weekdays AEST/AEDT

## Messaging

You can message us 24/7 through our AustralianSuper Mobile App and Facebook Messenger and chat with ASH (AustralianSuper Helper Bot) and our contact centre agent staff.

Web Messaging is also available on our website through the contact us page ([australiansuper.com/contact-us](https://australiansuper.com/contact-us)) between 8am and 8pm AEST/AEDT weekdays.

## Translation services

We offer a free over-the-phone translation service in just about any language. Our consultants can arrange for you, or a family member, to talk to someone about your super in the language you understand best.

Call us on **1300 300 273** between 8am and 8pm AEST/AEDT weekdays.



This modern slavery statement was issued in [November] 2022 by AustralianSuper Pty Ltd ABN 94 006 457 987 AFSL 233788, the Trustee of AustralianSuper ABN 65 714 394 898, and may contain general financial advice that does not take into account your personal objectives, situation or needs. Before making a decision about AustralianSuper, consider if the information is right for you and read the Product Disclosure Statement, available at [australiansuper.com/pds](https://australiansuper.com/pds) or by calling **1300 300 273**.

A Target Market Determination (TMD) is a document that outlines the target market a product has been designed for. Find the TMDs at [australiansuper.com/tmd](https://australiansuper.com/tmd)