

Modern Slavery Statement 2023

ANZ Staff Superannuation (Australia) Pty Limited (AFSL 238268 RSEL L0000543) (the “Trustee”) is the trustee of the ANZ Australian Staff Superannuation Scheme (RSE R1000863) (“ANZ Staff Super”). The Trustee does not own or control any other entities.

The Modern Slavery Act 2018 (Cth) (the “Act”) came into force on 1 January 2019.

This is ANZ Staff Super’s Modern Slavery Statement for year ending 31 December 2023 prepared in accordance with the Act. It outlines actions taken in 2023 to assess and address the risk of modern slavery occurring in our operations, supply chain or investments.

While the Trustee is a non-controlled subsidiary of Australia and New Zealand Banking Group Limited (“ANZ”), we have engaged regularly with ANZ sharing information and resources to support the development of our approach to assessing and addressing this risk. ANZ’s 2023 Modern Slavery Statement is available at anz.com.au.

Our structure, operations and supply chains

Structure and operations

ANZ Staff Super is a non-public offer superannuation fund. The primary purpose of ANZ Staff Super is to provide well governed, value for money superannuation for its members.

ANZ Staff Super was established in 1987 to provide superannuation benefits to:

- current and former employees of Australia and New Zealand Banking Group Limited and associated companies in Australia;
- spouses of these members; and
- members who have opted to take their benefit in the form of an account based pension.

ANZ Staff Super has around 30,000 members and pensioners and manages assets of over \$6.49 billion for its members.

The Trustee is responsible for setting the strategic and business priorities for ANZ Staff Super and overseeing the operation and management of ANZ Staff Super in the interests of members and other beneficiaries.

The Trustee’s responsibilities are carried out by a Board of Directors. The Trustee’s Board comprises eight Directors. ANZ appoints four of the Directors and members of ANZ Staff Super elect the other four Directors.

Supply chain

The Trustee’s business activities are undertaken through outsourced arrangements with a range of specialist service providers.

The day-to-day management of ANZ Staff Super is outsourced to the Group Superannuation Department (“GSD”) of ANZ. This department has been delegated certain functions and supports the Trustee by overseeing member communication and education, compliance and governance, investment services and statutory requirements.

The other outsourced services include:

- administration, member services and accounting;
- provision of limited financial advice;
- life insurance;
- investment management;
- custodial services;
- legal advice;
- actuarial;
- audit;
- taxation adviser.

Technology, premises, procurement and other support are provided by ANZ.

Details of our service providers are available on our [website](#).

Investments

ANZ Staff Super’s investments are managed by specialist external managers primarily through pooled trusts. Investments include Australian and international equities, property, fixed interest securities, cash and alternative assets. Further information on our investments is set out in our Product Disclosure Statements and reporting available on our [website](#).

Managing exposure to environmental, social and governance (“ESG”) factors, including modern slavery risks, is a necessary element in ensuring that the Trustee’s investment portfolio continues to maximise its likelihood of future investment success relative to its long term risk exposures. The Trustee considers ESG factors in developing its investment management arrangements.

Risks of modern slavery practices in our operations, supply chains and investments

Our approach to identifying modern slavery risks is guided by the following resources:

- Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities;
- The Global Slavery Index 2023
- RepRisk Database
- Modern Slavery Reporting – Guide for Investors; and
- Modern Slavery Risks, Rights & Responsibilities – A Guide for Companies and Investors.

Our risk assessment is focussed predominately on the potential risks to people of modern slavery. We assess our operations, service providers and investments annually to identify areas where there could be a risk of modern slavery. The assessment takes into consideration the reference material mentioned above, our service providers' published modern slavery statements, and their responses to our questionnaire.

Operations

Our assessment identified that risk of modern slavery across our operations continues to remain low. This is based on the nature of our business, its operating model and structure, the services and products we provide within the financial services sector, our governance arrangements and work environment, and that we operate in Australia.

ANZ Staff Super's approach to human rights in its operations focuses on confirming individuals' rights to work in Australia and maintain a safe, healthy and inclusive workplace.

There are policies and procedures in place to ensure that the ANZ staff managing ANZ Staff Super are provided with a safe and high-quality work environment in the corporate office. The health and safety of our management team is also a priority in relation to hybrid work arrangements. All ANZ staff are required to complete an annual assessment of their work from home arrangements and support is provided to ensure a safe hybrid work environment.

Suppliers

As most of our service providers continue to operate in Australia and consist of skilled white collar workers in professional industries with minimal labour-related risks, our assessment that the risk of modern slavery practices remains low is unchanged. Therefore, we have continued to focus on the risk in relation to our investment activities.

Investments

Our initial analysis identified that the greater risk of modern slavery exists where investments have direct exposure to countries with a high prevalence of modern slavery according to the risk data from the Global Slavery Index. Despite some of these investment managers having investments in countries with a high prevalence of modern slavery, they have produced their modern slavery statements which denotes that they have an understanding of modern slavery risks.

Actions taken to assess and address potential modern slavery risks

Due diligence

In 2023, we engaged ANZ's Group Procurement team to re-screen our service providers for potential modern slavery risks. Using a third party tool (RepRisk), we were able to measure the reputational risk of our service providers across 28 risk parameters selected and defined in accordance with key international standards, such as the Ten Principles of the UN Global Compact, including employee relations (including forced labour and child labour). This screening revealed no incidents of modern slavery or forced labour by any of our service providers.

The reputation risk index ("RRI") quantifies reputational risk exposure related to ESG factors. A RRI of 50 or greater would be considered a high risk exposure and would warrant a more detailed review of the nature of the risk. These reputational risk assessments once again indicated that none of our service providers had a high risk exposure to ESG factors, i.e. a RRI of 50 or more.

We will continue to conduct reputational risk assessment annually for existing service providers and during the tender process for any new service providers. Where a service provider is identified as having a RRI of 50 or greater, we will request further information be provided to allow us to assess their actions to address the issue(s).

In 2023, we continued our due diligence by engaging with our investment managers who have direct exposure to countries with a high prevalence of modern slavery.

The responses from these investment managers provide encouraging results regarding their exposure to such countries which included the following:

- 33% of respondents had reduced their exposure to countries with a high prevalence of modern slavery.
- 33% of respondents had altered their exposure to countries with a high prevalence of modern slavery having been able to identify potential risks as a result of companies developing their disclosure of modern slavery risk and through their recent in-depth reviews of the geographical modern slavery risk across their portfolios.
- 66% of respondents that are not mandated to report under the Act have policies and procedures to manage instances of modern slavery in their organisations or investment portfolios.

Remediation

As our approach to identifying and managing modern slavery risks matures, we will develop our response to remediate instances where a modern slavery risk may have arisen. Should we become aware of a potential modern slavery risk in our operations, supply chains or investments, we will investigate the issue and determine an appropriate approach for addressing it. In the normal course of events, we would seek to engage and work with the supplier or investment manager in the first instance to address the issue and its recurrence. Termination of the relationship or investment would be an option should we be uncomfortable with their remediation of the issue.

Assessing effectiveness

We recognise that developing our approach to assessing and addressing modern slavery risks is a continuous improvement process and we will continue to work on enhancing our approach. We continue to work on developing our approach for measuring the effectiveness of our approach and defining measures of effectiveness.

We assessed the effectiveness of our actions in response to modern slavery across three key themes:

Awareness

The understanding and awareness of what modern slavery is and how to identify and report it is tracked via multiple channels. In 2023:

- the GSD team completed the annual mandatory learning module Financial Crime Essentials which includes a case study on modern slavery through forced labour;
- the GSD team completed mandatory training on our obligations and responsibilities under the Trustee's Whistleblower Protection Policy;
- we engaged with our investment managers regarding their direct exposure to countries with a high prevalence of modern slavery; and
- our annual Supplier Code of Practice (SCOP) was issued to and completed by our largest service provider which is engaged to provide superannuation administration and administration services. The SCOP is a survey covering governance, human rights (compliance with domestic laws and policies in regards to modern slavery), occupational health and safety, ethical business practices and environmental management.

Policies/processes

The RepRisk tool and SCOP survey complement our policies and processes to assist us to mitigate modern slavery risk in our operations and supply chains.

The Whistleblower Protection Policy supports employees, officers, suppliers and other relevant parties to raise a suspected or actual breach of the Modern Slavery Act 1988. The whistleblower reporting process includes a specific legal obligation to safeguard anonymity and protect a reporter's identity.

Any compliance or risk incident, including modern slavery, is recorded in the Trustee's incident register and addressed in accordance with its policies.

Compliance with our policies continues to be monitored through our auditing, testing and management processes overseen by the Trustee's Risk, Audit and Compliance Committee.

All employees and officers are supported to raise concerns of modern slavery via multiple channels, such to their line manager or senior manager and via the whistleblower reporting service.

Due diligence

We continue to screen our service suppliers for potential modern slavery risks. Our due diligence processes in relation to the appointment and renewal of service providers also includes consideration of their approaches in relation to managing modern slavery risks.

In 2023, none of our service providers were identified as having a high risk exposure to ESG factors and no incidents of modern slavery risk were identified in our internal operations.

Improving our response over time

To improve our approach to assessing and addressing the risk of modern slavery occurring in our operations, supply chain or investments, in 2024 and beyond, we will:

- engage with our service providers to continue to raise awareness and improve our understanding of the potential risk of modern slavery practices in our supply chains;
- continue to provide training to our employees and officers to build awareness and identify modern slavery risks;
- continue to engage with our investment managers to better understand their ESG processes and how they assess and address the risk of modern slavery within their operations and investments;
- review our policies and update them where necessary; and
- continue to engage with other organisations (including ANZ and subject matter experts) to further improve our understanding of the potential risk and continue to develop our approach to managing modern slavery risk

This statement was approved by the Board of ANZ Staff Superannuation (Australia) Pty Limited, the Trustee of ANZ Australian Staff Superannuation Scheme, at its meeting on 25 June 2024.



Janet Torney
Chair
ANZ Staff Superannuation (Australia) Pty Limited
25 June 2024