



Modern Slavery Statement

June 2025

Version 4



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1 Background

Betashares is committed to identifying, monitoring and mitigating modern slavery risks within our business and supply chains.

Modern slavery involves serious forms of exploitation such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

This Modern Slavery Statement ('Statement') provides information on Betashares' approach to identifying, mitigating and addressing these risks, with the aim of maintaining responsible and transparent operations and supply chains.

This Statement has been prepared as a joint statement as permitted by section 14 of the Modern Slavery Act 2018 (Cth) ('the Act') and applies to the following entities:

- Betashares Financial Group Pty Ltd (ACN: 646 305 517) (parent entity)
 - Betashares Holdings Pty Ltd (ACN: 136 545 107)
 - Betashares Capital Ltd (ACN: 139 566 868, AFSL 341 181), and
 - Bendigo Superannuation Pty Ltd (ACN: 644 620 128)
- (collectively 'Betashares', also referred to as 'us', 'our' and 'we').

Betashares Holdings Pty Ltd and Betashares Capital Ltd are wholly owned subsidiaries of Betashares Financial Group Pty Ltd.

Bendigo Superannuation Pty Ltd (ACN: 644 620 128) ('BSPL') was acquired by Betashares Financial Group Pty Ltd with an effective date of 1 September 2024. BSPL was previously owned by Bendigo and Adelaide Bank Limited. As such, Betashares' reporting obligations in respect of the Act for BSPL commenced as at the change of control on 1 September 2024.

BSPL has migrated to the calendar year reporting period in alignment with the parent entity. BSPL has been included in this Statement for the relevant period being 1 September 2024 – 31 December 2024 and will revert to a full calendar year reporting period for Betashares' Statement for the 1 January 2025 – 31 December 2025 period.

Betashares' registered office is Level 46, 180 George Street, Sydney, New South Wales.

In preparing this Statement, we consulted with relevant senior members of Betashares across each of the reporting entities as required under the Act. Common staff and business policies apply across the reporting entities.

This Statement relates to the reporting period commencing 1 January 2024 and ending 31 December 2024.

Betashares Compliance is responsible for the operation of this Statement.

2 About Us

Established in 2009, Betashares is an Australian based asset management business specialising in exchange traded funds (ETFs) and other funds traded on the Australian Securities Exchange (ASX). Betashares seeks to help Australians build their wealth, guided by core principles: simplicity, cost-effectiveness and transparency.

Betashares Financial Group Pty Ltd is an Australian company governed by its Board of Directors. It is the parent company within the Betashares group. Its main operating entity is Betashares Capital Ltd, which holds an Australian Financial Services Licence (No. 341181) and acts as responsible entity for over 90 funds. Betashares Holdings Pty Ltd is the employing entity and conducts certain procurement activities on behalf of the group. Bendigo Superannuation Pty Ltd is a subsidiary of Betashares Financial Group Pty Ltd and operates as a registrable superannuation entity (RSE) licensee.

As at 31 December 2024, Betashares operates in Australia and New Zealand and employs over 150 staff.

More information about Betashares can be found at www.betashares.com.au.

3 Our Operations

Betashares is a leading Australian asset management business. Our predominant business activity involves operating

ETFs and other funds in our capacity as responsible entity.

Betashares acknowledges there is modern slavery risk in investment portfolios. Our operations include internally managing rules-based or passive investment portfolios, providing investors with access to a range of asset classes including equities, cash, fixed income, hybrids, currencies and commodities. All investments involve buying, holding or selling assets that are publicly traded on recognised securities exchanges around the world, or traded on well-established, institutional over-the-counter markets.

Many of Betashares' arrangements with service providers reflect existing long-standing relationships.

4 Our Supply Chains

Betashares engages outsourced service providers to provide a range of goods and services. The main services procured are:

- fund administration
- fund unit registry
- fund custodial services
- brokerage services
- clearing and settlement services
- research services
- IT services
- professional services e.g. legal and tax advice
- external investment management
- marketing and advertising services (business and fund related), including promotional materials and merchandise
- office services
 - cleaning services
 - catering services
 - office supplies

The outsourced service providers we have engaged are predominantly Australian based companies, with Australia being a country with a low prevalence of modern slavery according to the Global Slavery Index. We conduct appropriate due diligence prior to engaging with new service providers.

5 Our Modern Slavery Risks

We understand modern slavery can occur in many forms, including human trafficking and forced labour. Betashares takes a risk-based approach to identifying, mitigating and managing modern slavery risks that may be present within its supply chain. In conducting our risk assessment on our suppliers, we considered a number of factors including geographic location, industry, types of products and services, and supply chain models.

Our approach to reducing the risk of modern slavery within our supply chain and our operations is guided by the UN Guiding Principles on Business and Human Rights and the United Nations Global Compact.

Due to the nature of Betashares' business interests, the highly regulated nature of the Australian financial services industry, Australia's well-developed "fair work" regulations, the large and reputable nature of our service providers (many of which are themselves subject to modern slavery-related regulations), and the generally simple nature of our supply chains, the risk of modern slavery within our operations and supply chains remains relatively low.

Despite this, Betashares acknowledges that our use of office services such as cleaning services and suppliers used to make company merchandise may carry a higher level of modern slavery risk due to their industry and geographic location. Similarly, where appointed service providers provide services through offshoring arrangements, we acknowledge this also carries a higher risk of modern slavery.

We have obtained supply-chain details and made enquiries with our suppliers and continue to monitor and review the

perceived risk of modern slavery.

Our specific modern slavery related risks present are captured in a risk register maintained by Betashares Compliance.

6 Our Actions

We seek to mitigate the risk of modern slavery in various ways, including consultation and review with our existing service providers and conducting due diligence on any proposed new service providers.

Any proposed new business ventures and partnerships consider the associated risk of modern slavery.

Governance

i. Our investment portfolios

All investments involve buying, holding or selling assets that are publicly traded on recognised securities exchanges around the world, or traded on well-established, institutional over-the-counter markets. Listed entities are typically subject to admission requirements that include ongoing obligations to comply with applicable laws, as well as modern slavery regulations where relevant to the entity.

We offer several products in our ethical suite which employ a screening process to exclude investments in companies whose activities have detrimental impacts on people, society or the environment. Depending on the product, the screens exclude companies with evidence of human rights violations, including child labour, forced labour and sweatshops.

To assist in the screening process, Betashares subscribes to data services which provide us with a range of environmental, social and governance (ESG) metrics, including controversy measures relating to human rights and modern slavery.

We also procure the services of a number of external investment managers to oversee certain actively managed investment portfolios. Certain of these managers explicitly take into account ESG factors, including modern slavery concerns, as part of their investment decision-making process.

ii. Our commitment to stewardship

Betashares offers a broad range of investment strategies designed to give investors access to investment markets, sectors, or themes in an efficient and cost-effective manner. As an investor, we have limited visibility into the operations and supply chains of portfolio companies over and above the regulatory reporting and voluntary disclosures of security issuers.

We seek to address this risk by engaging with companies and undertaking proxy voting in accordance with our proxy voting guidelines, designed by our proxy adviser, Institutional Shareholder Services (ISS). These guidelines recognise that ESG factors can present material risks in investment portfolios and were specifically formulated to align with the stewardship principles of the Principles for Responsible Investment (PRI). We publish our full proxy voting record on an annual basis on our website.

To address the modern slavery risks that may be present in portfolio companies, some of our strategies specifically target ESG-related themes or employ negative and norms-based screens. We seek to be transparent in disclosing the ESG considerations incorporated into product design, portfolio construction and security selection processes.

Betashares has established a Responsible Investment Committee (RIC) to provide oversight and guidance on ESG-related issues for our ethical products. The RIC monitors the index constituent companies within our relevant ethical portfolios and recommends exclusion of companies that seriously breach social norms. This may include breaches of human rights (child labour, forced labour) and bribery and corruption. Where an issue may arise in relation to a portfolio holding that the RIC believes conflicts with the fund's values, or where the RIC believes a company could improve its ESG performance, the RIC will engage with the company to understand the situation in more detail and, if necessary, advocate for improvement.

Betashares is a signatory to the PRI, which is supported by the United Nations and works to support the incorporation of ESG factors into investment decisions. Betashares is also a member of the Responsible Investment Association Australasia (RIAA) and is committed to its goal of ensuring capital is aligned to achieving a healthy society, environment and economy.

Policies

To identify and address the modern slavery risks that may be present in Betashares' operations and supply chain, Betashares maintains a number of policies that govern the way it operates. These policies include:

i. Code of Conduct

Betashares strives to foster a work environment and culture that is built on integrity, respect, trust and transparency. All employees are expected to comply with the Code of Conduct which outlines our values and standard of behaviour within the business.

ii. Staff engagement survey

Betashares consults with employees on an annual basis through a survey that captures employee engagement within the business on areas such as wellbeing, job satisfaction and leadership.

iii. Outsourcing

Betashares only seeks to engage with reputable and high calibre external service providers. The outsourcing policy explicitly requires that consideration be given to modern slavery risk present in any proposed new external service provider.

iv. Whistleblowing

Betashares acknowledges that whistleblowers play an important role in identifying and calling out misconduct. Betashares maintains a Whistleblower Policy which encourages the reporting of unethical behaviour without the threat of adverse consequences.

v. Risk Management

Betashares notes the risk of modern slavery within the business and has sought to implement mitigating controls. The risk management policy describes the risk mitigation process to be followed.

vi. AML/CTF

Betashares recognises that criminals may look to the financial sector to exploit vulnerabilities in the form of money laundering and terrorism to fund other illicit conduct. Betashares is committed to monitoring and combatting such crimes through compliance with relevant Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) legislation. This includes maintaining an AML/CTF Program which is reviewed annually and ensuring a robust risk framework is implemented to protect investors and the business from financial crime.

Recruitment

Betashares employs staff either directly or with the assistance of recruitment agencies. All employment agreements are prepared by Betashares, and set out the rights and obligations of each party. We conduct background checks on each new employee and ensure that the new employee is eligible to work in the applicable jurisdiction. We ensure that all employees are paid a fair salary in accordance with applicable laws and regulations. Betashares also ensures that it complies with all relevant legislation relating to superannuation and leave.

There are a number of policies and procedures in which all employees have their respective rights protected.

Training

Betashares provides modern slavery-related training to all employees as part of the group wide induction process. Modern slavery is also a topic that is covered during our Annual Compliance Training sessions. From time to time, Betashares may also provide specific training for employees that engage with third party suppliers.

Training is also provided on Betashares' incident reporting process. Emphasis is placed on ensuring that if an incident such as modern slavery occurs, it is reported to Betashares Compliance as soon as practicable to enable the appropriate actions to be taken to address the impact of the incident.

During the reporting period, all staff attended Betashares' Annual Compliance Training sessions.

Due diligence

As part of Betashares' due diligence on service providers and broader risk management, we obtain modern slavery-related compliance confirmations from each of our material service providers on an annual basis.

Sanctions screening

We screen our suppliers against a number of sanctions lists on at least an annual basis. Our policy is to screen any new counterparties with direct responsibility of funds prior to engagement as part of our due diligence process. Engaging with individuals or suppliers from sanctioned countries is prohibited.

Our service providers were screened for the relevant reporting period and no adverse results were found.

Betashares Risk Management Committee

Betashares' Risk Management Committee meets on a quarterly basis to discuss and review the risks present within the business. Should there be an instance of modern slavery within the business, the Risk Management Committee would be informed to assess the risk and consider appropriate remediation action.

7 Current Approach

Over the past year, we focused on conducting ongoing modern slavery checks. These included:

- conducting an annual review of the Betashares Group's risk register and the controls associated with the respective risks;
- delivering training at our induction and annual compliance training sessions, with attendance monitored to ensure all staff were present;
- reviewing applicable policies and monitoring the number of reports relating to modern slavery;
- conducting a review on the Modern Slavery Statements of prospective service providers and subscription based services; and
- seeking to insert modern slavery clauses within service provider agreements, where possible.

To assess the effectiveness of our actions, we monitor our progress in areas such as:

- **Training** – delivery of training and attendance during induction as well as Annual Compliance Training sessions.
- **Service provider due diligence** – completing checklists on new service providers throughout the reporting period.
- **Compliance with policies** – reviewing applicable policies and monitoring the number of reports relating to modern slavery.
- **Grievance mechanisms** – the number of reports made relating to modern slavery or whistleblowing.
- **Risk management** – we refined our modern slavery risk management framework and will continue to modify this in the interests of continuous improvement.

Betashares will continue to monitor these areas on an ongoing basis and add to this list as appropriate.

We review our Statement on an annual basis.

8 Looking Forward

Betashares is committed to improving our response to modern slavery risks in our operations and supply chain each year. We will continue to monitor for instances of modern slavery and work with the relevant parties to manage these risks appropriately.

We have committed to completing a materiality-based risk assessment of our supply chains. We will also continue to seek to promote greater awareness of modern slavery risks within our supply chain by increasing the number of supplier contracts with modern slavery clauses.

We are currently in the final stages of implementing a standalone Sanctions Policy which considers the onboarding of counterparties and third-party suppliers which reinforces due diligence processes and enables the identification and exclusion of high-risk entities.

Noting our commitments made in our FY23 Statement, we continue to endeavour progressing activities in relation to:

- Implementing a Modern Slavery Compliance Attestation for ongoing service providers.
- Documenting our procedures in a Procurement Policy which will set out our process when engaging suppliers and considers Modern Slavery.
- Establishing a channel in which employees are able to report instances of modern slavery to the Betashares Compliance team.

This Statement has been approved by the Board of Betashares Financial Group Pty Ltd as the parent entity.



Alex Vynokur

Chief Executive Officer, Betashares

30 June 2025

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Betashares Financial Group Pty Ltd as defined by the Modern Slavery Act 2018 (Cth)¹ (“the Act”) on 30 June 2025.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Betashares Financial Group Pty Ltd as defined by the Act².

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity’s structure, operations and supply chains.	1-2
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2-3
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	3-5
e) Describe how the reporting entity assesses the effectiveness of these actions.	5
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	N/A
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	N/A

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement ‘Do not own or control any other entities’ instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

¹ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

² Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.