

Modern Slavery Statement

Financial Year 2024



Acknowledgement

OF COUNTRY

We acknowledge the Traditional Custodians of the lands on which we work and live and recognise their continuing connection to land, water, and community. We pay our respects to Elders past and present.

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Futurity's commitment towards eradicating modern slavery

Futurity Investment Group Limited (Futurity) is committed to living its values of curiosity, courage, care, passion, and results. A critical part of this is not only ensuring that we conduct our business within the law, but that we as an organisation seek to act as a model corporate citizen.

Futurity operates under a Code of Conduct known as *Our Ways of Working* which outlines the ethical framework we operate within. *Our Ways of Working* support and build on our values by describing how we strive to live our values in our day-to-day activities.

Futurity's fourth Modern Slavery Statement ("Statement") is published in accordance with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) on a voluntary basis covering the period 1 July 2023 to 30 June 2024 ("Reporting Period").

It outlines Futurity's approach to identifying, assessing and addressing modern slavery risks in our operations, supply chain and investments.

The offence of modern slavery occurs where offenders use deception, coercion or threats to exploit victims and undermine their freedom. It is entirely counter to our law and community values. Wherever it occurs, it is counter to basic human rights.

Futurity understands that modern slavery has severe consequences for victims and that it can occur in every industry and sector, and any location.

As an Australian-based financial services organisation providing education-purposed savings and investment products, Futurity is potentially exposed to the risk of modern slavery on two levels - in our operations and supply chains, but also through our investment activity.

As a purpose driven organisation, Futurity aims to continuously improve our approach to ethical and sustainable business across all operations.

Craig Dunstan, Chair

December 4, 2024

Sam Sondhi CEO

CRITERIA 1.0

Identifying the reporting entity

This Modern Slavery Statement is prepared and issued by Futurity Investment Group Limited, ACN 087648879, AFSL 236665, ACL 236665. (Futurity", "we", "us", "our", or the "parent" company).

Our subsidiaries are non-operational and are supported by our resources. In assessing the risks of modern slavery that may exist within our supply chain we have considered all our subsidiaries to be at the same risk level as the parent company.

CRITERIA 2.0

Describe the entity's structure, operations and supply chains

STRUCTURE

Futurity, formerly Australian Scholarships Group Friendly Society Limited, is a registered Friendly Society, operating primarily in Australia, with its funds in New Zealand now closed to new business.

Futurity is a mutually structured company limited by shares and guarantee with only customer members. No shares are currently issued.

We employ 47 staff and have a Board of Directors who oversee operations.

OPERATIONS

Futurity distributes Education Bonds products via two main channels, online and via licensed financial advisers.

Given the nature of Futurity's business, the risk of modern slavery practices occurring within its business operations is assessed as low.

This is based on Futurity being a financial services business providing investment and savings plan style products, combined with its business operations being Australia-based, with some members in New Zealand.

SUPPLY CHAIN

Futurity recognises the possibility that we have indirect exposure to modern slavery risk within our supply chain and our investment activity. We operate in Australia and New Zealand, and the products and services purchased by Futurity are generally limited to information technology (hardware, software and services), professional services, marketing materials and services, utilities, office supplies and food and beverage supplies.

Most of Futurity's suppliers with whom we have material contracts (\$>50k) are based in Australia where there is a low inherent risk of modern slavery practices.

To understand the supplier risk more fully, Futurity has either reviewed the modern slavery statements of its suppliers or obtained the results from our targeted modern slavery questionnaire.

INVESTMENTS

Futurity's supply chain also consists of investments which are controlled by external investment managers. Futurity currently has investments across 20 different investment managers. Futurity's investments may be indirectly exposed to modern slavery risks through the operations of the companies in which external funds invest.

As a result of testing the supply chain within the reporting period, Futurity's assessments of its overall modern slavery risk is **low**.

CRITERIA 3.0

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

As an Australian-based financial services organisation providing education-purposed savings and investment products, Futurity may be exposed to the risk of modern slavery on two levels - in our operations and supply chains, but also through investment activity.

SUPPLY CHAIN

Most of Futurity's suppliers with whom we have a material contract (\$>50k) are Australian based suppliers who have a lower inherent risk of Modern Slavery.

Some risk may exist within the supply chains of our suppliers such as sourcing IT hardware and marketing merchandise from foreign suppliers.

Futurity again tested our supply chain through reviewing the results of the self-assessment questionnaire and reviewing the Modern Slavery Statements of all those suppliers who report. Following this due diligence process we have not identified any new risks and have not changed our risk rating.

INVESTMENTS

Futurity recognises that investment decisions made by the external investment managers appointed to invest on behalf of our multi-manager funds may indirectly expose Futurity to modern slavery risks.

Such risk may be heightened where the business ultimately receiving the capital from Futurity is domiciled in a high-risk jurisdiction or where it is involved in an industry known to have a high risk of modern slavery.

While Futurity does not make the individual investment decisions in these circumstances, it is important for us to make sure our investment managers consider modern slavery risk in their investment processes.

Consistent with Futurity's Responsible Investment Policy, our investment manager selection process includes an assessment of how each investment manager addresses and incorporates Environmental Social Governance (ESG) issues as part of their investment approach.

Our assessment of Futurity's overall modern slavery risk remains low.

CRITERIA 4.0

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

Futurity monitors modern slavery risk in our operations and supply chain on an ongoing basis.

During the Reporting Period, we further enhanced our modern slavery risk identification and assessment process.

Enhancements include:

- Implementation of Combatting Modern Slavery training for all staff and contractors which is completed upon commencement and refreshed every two years.
- Developing an improved online modern slavery questionnaire intended to help assess modern slavery risk profiling.
- Updating our Responsible Investment Policy, which was introduced in 2023, and implementing a continuous monitoring program.

Futurity's modern slavery questionnaire is completed by new suppliers with material contracts (defined as >\$50k) and on contract renewal of existing suppliers to understand which suppliers may pose a modern slavery risk.

Futurity's scope for assessment of procurement in the 2024 Financial Year involved 33 suppliers with whom we have material contracts. In addition, we surveyed our 20 investment managers or conducted a review of their Modern Slavery Statements.

None of Futurity's suppliers were identified as having a material modern slavery risk in this reporting period.

Where activities are identified or brought to Futurity's attention which may contribute to modern slavery risk, Futurity will act immediately to address the risk.

SELF-ASSESSMENT QUESTIONNAIRE

The questionnaire covers the following five key areas:

Supplier details - to assist us in ensuring all suppliers identified as requiring assessment have been captured.

Policies and procedures - helps us understand the supplier's approach to reducing the risk of modern slavery within their operation and supply chains.

Supply chain management - to help us understand their approach to assessment and management of modern slavery risks and impacts in their supply chain, including mapping of regions, sectors and industries most at risk of embedded modern slavery practices related to supplier point of origin.

Existence of modern slavery risks - we seek to specifically understand if the supplier has identified any modern slavery risks and their impact within their own operations or supply chains (both domestic and international).

Foreign labour use - helps us understand if there are any potential risks of modern slavery in their international workforce or foreign subcontractors.

Futurity's investments may also be indirectly exposed to modern slavery risks through the operations of the companies in which our external investment managers invest:

- Futurity seeks its external investment managers to adhere to our Responsible Investment Policy introduced in September 2023. This policy outlines the beliefs, principles and commitments that shape our approach to investment in a responsible way.
- In selecting external investment managers, we also consider their commitment to the United Nations Principles for Responsible Investment (UNPRI). We aim to invest more than 90% of total funds under management with investment managers that are signatories to either of the UNPRI and/or the UN Global Compact (UNGC).

CRITERIA 5.0

Describe how the reporting entity assesses the effectiveness of these actions

Futurity monitors the effectiveness of its processes and procedures to address the modern slavery risks that our business is exposed to via our suppliers and investment managers.

We track the response rate to our self-assessment questionnaire, this year 48% of eligible suppliers responded to the survey and a further 30% who did not respond had a Modern Slavery Statement.

All Futurity's investment managers and therefore the associated Underlying Managed Funds (UMFs) were able to provide evidence of a commitment towards addressing modern slavery.

Futurity tracks the completion rate of mandatory staff training modules including the Combatting Modern Slavery training, Futurity Whistleblower Service Training and the Code of Conduct and Our Ways of Working training and ensure all new employees complete these modules within one month of their commencement date, and every two years thereafter.

In this reporting period the Combatting Modern Slavery training module had a 100% completion rate.

Futurity's grievance process is monitored and any grievances raised regarding modern slavery risk are acted upon, to date no related grievances have been made.

Futurity will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by conducting an annual review of existing suppliers and conducting due diligence on new suppliers. Based on the results of this annual review we will review our approach and ensure it remains relevant and appropriate to the risk level.

During the next reporting period we will work towards:

- Increasing the survey completion rate to above 90%.
- Introducing a Supplier Statement to ensure all suppliers are aware of the risks of modern slavery and our commitment to making a positive difference.
- Developing a risk assessment tool to assess which suppliers with contracts below >\$50k should be
 asked to complete the self-assessment questionnaire.
- Expanding the criteria for completion of the self-assessment questionnaire to include those suppliers with contracts below \$50k where the risk assessment tool indicates potential exposure to modern slavery risks in the suppliers' operations.

CRITERIA 6.0

Describe the process of consultation with any entities the reporting entity owns or controls

Not required. This report is regarding the operations of a single entity, Futurity Investment Group Limited.

CRITERIA 7.0

Provide any other relevant information

As a purpose driven business with a focus on social impact, Futurity is engaging with more suppliers who operate with a social benefits impact model and is looking to increase our engagement with First Nations owned businesses as part of our Reflect Reconciliation Action Plan.

Futurity will make further improvements in the next reporting period as outlined in Criteria 5.

This statement was approved by the Board of Futurity Investment Group Limited in their capacity as the principal governing body of Futurity Investment Group Limited on March 28, 2025.