

BENDIGO AND ADELAIDE BANK

# Modern Slavery Statement 2021

# Overview

This is Bendigo and Adelaide Bank Limited's (the Group) Modern Slavery Statement for 2021. It outlines our commitment to advancing human rights and the steps we have taken to prevent the risk of modern slavery in our business and supply chains.

Our vision is to be Australia's bank of choice, driven by our purpose to feed into the prosperity of our customers and communities. This purpose underpins everything we stand for and the action we take.

Our approach to reducing the risk of slavery or human trafficking within our supply chain and our operations is guided by the UN Global Principles on Business and Human Rights, the Finance Against Slavery and Trafficking Blueprint and Australian Border Force.

We have embedded our modern slavery risk management approach through our Group Anti-slavery and Human Trafficking Policy. This policy outlines our commitment and process for managing modern slavery risks in our business activities and operations and the governance and oversight in place to support these commitments.

Modern slavery action is driven by a cross-functional working group that includes Compliance, Finance, Procurement, Risk and Corporate Affairs representation, as well as a lead from each of the Group's divisions. This group provides input into the modern slavery action agenda, helps to execute actions and reports back on work undertaken.

This statement has been produced to meet the requirements set out in the Modern Slavery Act 2018 (Cth) (the 'Act') for the period ending 30 June 2021. In this statement we refer to modern slavery as defined in the Act. Modern slavery is used as the term to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

## FY21 updates

In the past year, we have further developed our understanding and management of key risks associated with modern slavery, along with embedding a clear process to identify and report scenarios where modern slavery may be prevalent. Actions taken to embed our obligations include:

The implementation of the Group Anti-slavery and Human Trafficking Policy to address supply chain matters, operational governance and responsibilities within the Group.

Implementation of a Group-wide reporting tool to enable staff to confidentially document unusual activity that may indicate modern slavery facilitating further investigation.

A total of 43 Unusual Activity Reports (UARs) and Suspicious Matter Reports (SMRs) lodged outlining potential suspicions of modern slavery were investigated by Group employees. Of these reports, 7 were deemed to contain links to modern slavery and were reported to AUSTRAC.

Uplift and expansion of the Group's procurement capability. This has included the addition of new employees, revisions of core policies, expansion and documentation of sourcing and contract management processes, and the planned introduction of a set of procurement software tools.

Commencement of a program to insert modern slavery contractual obligations in all new high to medium risk third-party vendor agreements.

An update of all new market request service tender documents for high to medium procurement risk categories to include statements that allow assessment of the respondent's capability to adhere to the Group's modern slavery provisions.

Implementation of new process for enterprise procurement requiring the completion of an intake form which includes specific modern slavery questions. This ensures modern slavery is considered at the outset of the procurement process.

Engaged FRDM Inc, a globally recognised supply chain compliance consultant, to further assess the Group's supply chain.

Roll out of mandatory comprehensive staff awareness training modules to all Group staff.

Implementation of a Group-wide internal communication and engagement program to provide employees with awareness of our commitment to reviewing and minimising the risks of our organisation causing, contributing or being linked to modern slavery.

Strengthening of modern slavery risk mitigation requirements within our procurement supplier engagement processes, including ongoing internal risk monitoring of suppliers with greater risk of modern slavery or human trafficking presence.

Completion of annual compliance surveys to capture business risk assessments, awareness and procedures to manage potential modern slavery risks.

In April 2021, an employee of Bendigo and Adelaide Bank was determined to have been involved in a long-term incidence of modern slavery in their own home. Due to the domestic nature of the offence, the Bank only became aware of it at the onset of criminal proceedings for the matter. On the basis of the charges and proceedings the Group considered it constituted both a breach of our Code of Conduct and our Anti-slavery and Human Trafficking Policy and the person's employment was immediately terminated. This experience highlights that modern slavery does occur in Australia, and even where we least expect it, and has further strengthened our resolve to progress our modern slavery work.

# Impacts of COVID-19

## ADDRESSING INCREASING CUSTOMER VULNERABILITY

Remote working, lock downs and loss of employment may contribute to the risk of financial hardship and duress for individuals as a consequence of the current COVID-19 pandemic. People who have lost, or experienced a reduction in, employment during the pandemic may be particularly vulnerable to exploitation.

COVID-19 has had a significant impact on Australians in how they live their lives, how they work and how they manage their businesses. Our Bank is fully committed to supporting our customers and communities through this unique time, with measures designed to provide financial relief from COVID-19, as restrictions change and the economy recovers.

More than 23,000 personal and business customer accounts have been provided with support to help customers manage the impacts of COVID-19 through to the end of FY21. During the pandemic, we contacted our business and agribusiness customers individually to understand the impact on their operations and to inform them of the support available from both the Bank and the Australian Government.

Throughout the pandemic, the Bank introduced a range of assistance measures to ensure short and long term support for business, consumer and agribusiness customers affected by COVID-19. These included;

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First announced in March 2020, home loan and business customers had the ability to apply for repayment deferrals on loans for up to six months in March 2020 and up to a further four months for eligible customers;

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Discounted interest rates on new personal loans taken out by existing Bendigo Bank customers;

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Waiver of interest rate reduction for early withdrawals on term deposits prior to maturity; and;

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Deferral of payments and extensions for equipment finance on a case by case basis.

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The Bank also reduced rates on various consumer and business loans during the onset of COVID-19 to assist in navigating the challenges at that time. Our approach has seen us become the highest rated bank for supporting business customers through COVID-19.

We are currently offering support to consumer, agribusiness and business customers significantly affected by the various COVID-19 restrictions announced nationwide since the middle of calendar year 2021.

# About Bendigo and Adelaide Bank

For more than 160 years, we have actively listened and responded to the needs of our customers and their communities. Over this period, more than 80 different organisations have come together to become the Bank we are today – an Australian owned, top 100 ASX listed company, with more than 110,000 shareholders.

We believe our success is driven by helping our customers, and the communities in which they operate, to be successful.

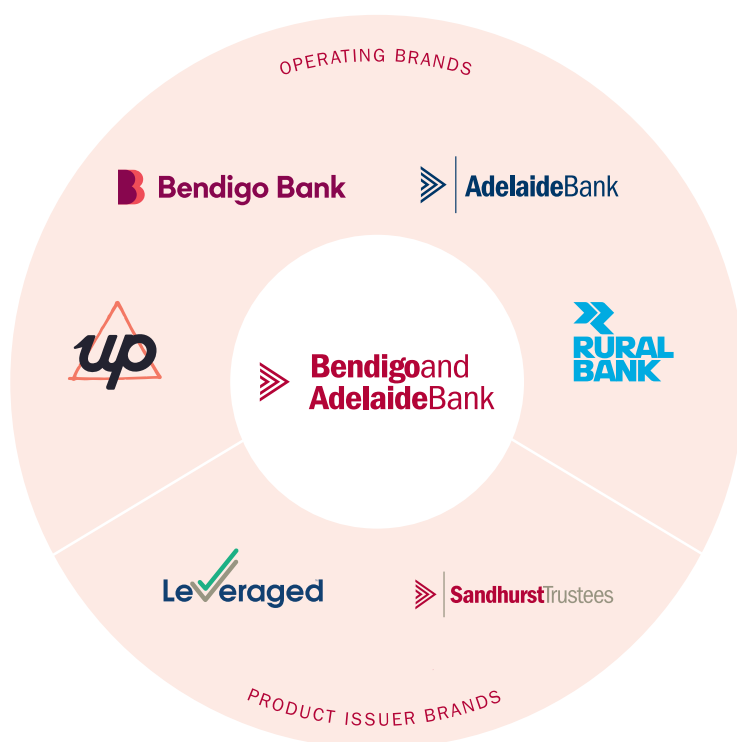
We have assets under management of more than \$76.2 billion and market capitalisation of around \$5.7 billion, as of 30 June 2021. We employ more than 7,000 staff helping more than 2.1 million customers to achieve their financial goals.

Our principal activities are the provision of banking and other financial services including lending, deposit taking, leasing finance, superannuation and funds management, insurance, treasury, foreign exchange services (including trade finance), and trustee services.

Our reach comprises a national network of proprietary and Community Bank owned branches, joint ventures, partner distribution networks, wealth release products for senior Australians, and a network of mutual financial institutions to release capital and service members.

Our impact is substantial. We aim to set an example of how banking should be: progressive, sustainable, shared and trusted.

Our different brands represent the diversity of our Bank. Together, our brands share a common purpose – to help our customers, partners and communities succeed. Our brands are:



The Statement applies to Bendigo and Adelaide Bank Limited and entities it owns and controls. The statement does not apply to our joint ventures. A list of owned and controlled entities is included in Appendix 1.

## How we think about modern slavery

We understand modern slavery can occur in many forms and encompasses eight types of serious exploitation including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour (situations where children are subjected to slavery or similar practices, or engaged in hazardous work) such as forced labour, child labour, domestic servitude, sex trafficking, and human trafficking. We also note that Asia Pacific is the highest risk region globally for Modern Slavery occurrence.

Fundamentally, we acknowledge that modern slavery is about risk to people. To frame the Group's thinking, we have used the continuum of involvement outlined in the UN Global Principles on Business and Human Rights:

<b>Cause</b>	A risk that an entity's operations directly result in modern slavery practices.
<b>Contribution</b>	A risk that an entity's operations and/or actions in the supply chain, may <b>contribute</b> to modern slavery.
<b>Direct link</b>	A risk that an entity's operations, products and services may be connected (i.e. <b>directly linked</b> ) to modern slavery through the activities of another entity with which they do business.

In considering the risks of modern slavery and developing our Anti-slavery and Human Trafficking Policy, we have considered the activities occurring in the following areas, representing the five key areas within the Group's operations and supply chains where modern slavery risks may exist.

<b>Financial products and services</b>	There is a risk that customers may use our products or services for activities that involve modern slavery.
<b>Lending and investment</b>	There is a risk we could lend to or invest in businesses involved in modern slavery, in particular through the Agri and horticultural sectors.
<b>Procurement</b>	There is a risk that we could purchase goods and services where modern slavery was used in their creation or delivery.
<b>Employment</b>	There is a risk of labour exploitation in our own workforce, particularly in our contracted workforce.
<b>Community Investment</b>	There is a risk that we support, directly or indirectly, via advocacy, donations and partnerships organisations involved in modern slavery.

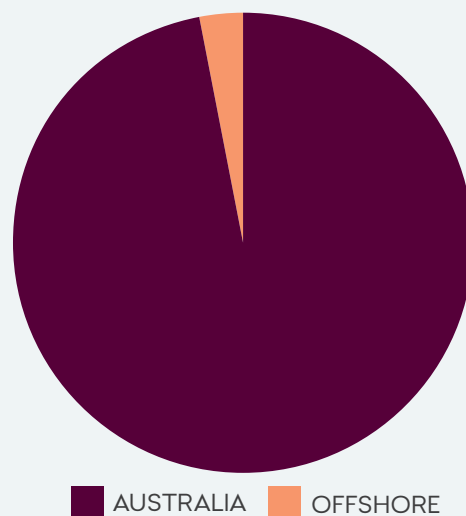
We consider our procurement; lending and investment; and financial products and services areas to be our three areas where modern slavery risk is most likely to occur and have provided further detail on these below. In FY22, we will develop our response in relation to employment and community investment.

## Bendigo and Adelaide Bank's supply chain

We source goods and services from over three thousand suppliers, with an annual procurement spend of close to \$700 million. Our policy is not to transact or maintain a contract with suppliers where there is a known presence of, or association with, slavery or human trafficking.

Where an instance of modern slavery is identified within our supply chain, we will work with our suppliers to remediate the issue through the request of clear action plans and reporting to support the eradication of modern slavery.

In this reporting period, 97.2 percent of our suppliers were engaged at a local and national level and 2.8 percent internationally. Our overseas supply chain includes 100 suppliers domiciled offshore, the majority of which are in the United Kingdom, Singapore and the USA. Group suppliers utilising offshore locations do so from countries that are predominantly assessed as low risk of modern slavery.

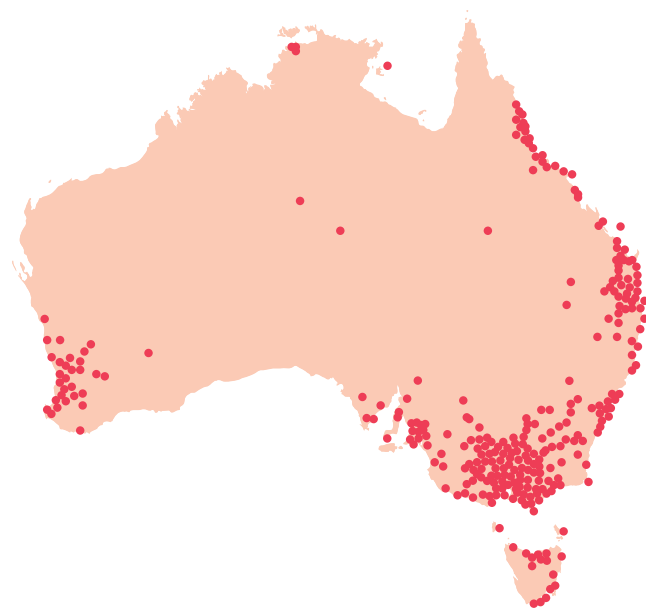


Offshore supply chain locations: United States, United Kingdom, Singapore, Canada, New Zealand, Ireland, Netherlands, Switzerland, Hong Kong, Austria, Belgium, Czechia, Denmark, Hungary, India, Israel, Sweden and Turkey.

Global map of the locations of Bendigo and Adelaide Bank's suppliers:



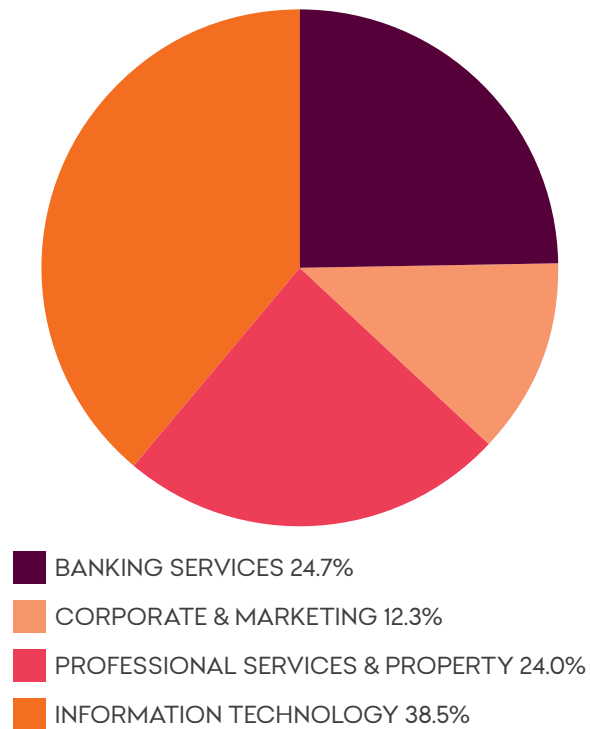
Australian map of the locations of Bendigo and Adelaide Bank's suppliers



Our major categories of procurement include:

- Information Technology (IT), digital and telecommunication;
- Property and facility management;
- Banking, lending and transaction services;
- Professional services;
- Print and postage (part of Corporate and Marketing);
- Human resources and people services (part of Professional Services).

### Baseline Spend Breakdown



In total, 91 percent of our procurement spend is with 10 percent of our suppliers, the majority of which are in Information Technology and Telecommunication (IT&T), Banking and Lending, Property and Professional Services categories.

In FY21, we further uplifted and expanded the Group's procurement capability. This has included the addition of new employees, revisions of core policies, expansion and documentation of sourcing and contract management processes, and the planned introduction of a set of procurement software tools.

In addition, we engaged FRDM Inc., a globally recognised supply chain compliance consultant, to further assess the Group's supply chain.

The complement of additional resources, polices, tools and engagement with independent assessment specialist will deliver a deeper insight to the tier 2 and 3 relationships of our existing supply chain partners, both domestically and internationally, providing transparency and awareness of potential impacts directly linked to modern slavery.

At the outset of new supplier relationships, these tools will provide stringent controls and immediate assessment capability to onboard the right supply chain partners who align with our Group's strategy to reduce the risk of slavery and human trafficking in our supply chain and operations.

Approximately 6 percent of our total suppliers have been assessed as operating in higher modern slavery risk locations and they will be investigated first to ensure no actual modern slavery practices exist within these suppliers.



## FUTURE SUPPLY CHAIN COMMITMENTS

Looking forward we will continue insertion of modern slavery mitigation contractual obligations in high to medium risk third-party vendor agreements.

For current supplier agreements, the Group will undertake a retrospective audit of active high to medium risk suppliers to ensure each contract contains the necessary modern slavery obligations. The risk factor will be assessed by an independent third party specialised in assessing modern slavery in supply chains. Following completion of this audit, a planning process will commence to ensure all non-compliant agreements are remediated.

The Group will finalise updates to all contractual templates, and these will ensure the latest versions of the modern slavery obligations are consistent.

Continue work to update templates and embed in additional sourcing, contract management and procurement operations functions within the Group's procurement with the implementation of our new procurement toolsets.

Continuous improvement of our third-party vendor modern slavery due diligence procedures and processes.

The Group will update all market service tender documents, and these will ensure the latest versions of the modern slavery obligations are consistent.

Updated market service tender documents will be further embedded in the sourcing, contract management and procurement operations functions within Group procurement with the implementation of our new procurement toolsets. The tools will allow probity checks to be incorporated into our way of working and in support of suppliers adhering to our modern slavery expectations.

Development of a supplier code of conduct that contains explicit anti-slavery provisions among other things to be formally accepted by all high to medium risk third-party vendors and expected of all other vendors transacting with us.

Embed in the Group's procurement function the supplier code of conduct in the sourcing, contract management, and procurement operation's practices and processes.

Ensure the supplier code of conduct is embedded in the Group procurement toolsets and that internal and external messaging is consistent with the relevant Group policies.

Establishment and implementation a third-party platform to support the ongoing monitoring and reporting of modern slavery presence and activity within our high to medium risk category third-party vendor supply chains.

Develop the dashboard reporting data supplied by FRDM Inc.

Plan for the remediation of any contracts that show modern slavery risk.

Conduct awareness training sessions related to procurement modern slavery risk across the Group.

Expand reporting on modern slavery risk presence via the FRDM Inc. platform to incorporate low modern slavery risk supply chain categories.

## Addressing the risk of modern slavery in our operations

Across our operational divisions, we have undertaken an external risk assessment of each division's lending and investment portfolios based on Australian and New Zealand Standard Industrial Classification (ANZSIC) and industry codes.

These assessments assisted our business to understand the high-risk industries where modern slavery may be present. This process also provided comprehensive initial assessment reports for each division of our operations and outlined the possible presence of slavery across relevant, respective industry codes.

In addition to this, each division has implemented new processes and procedures to be followed when undertaking an annual review of customer credit reporting for both existing and new customers.

This is accompanied by previously approved enhancements to our Commercial Credit Policy to uphold our commitment to assessing, addressing and remediating risks of modern slavery in our customers' business.

Credit policy changes to address modern slavery have also been applied across all entities of the Group.



In addition to these credit policy changes our Financial Crimes Risk function has embedded an enhanced reporting tool for all employees to access where suspected instance of modern slavery and/or human trafficking is identified. Where evidence-based material supporting the suspicion is identified, the Financial Crimes Risk function will subsequently flag this with the appropriate authorities.

In FY21, in response to the Group's focus on modern slavery training and awareness, along with the Financial Crimes Risk reporting tool, there was 43 suspected instances of modern slavery and/or human trafficking reported. Following investigation, seven (7) of these reports were found to be potentially cases of modern slavery, 50 percent of the remaining cases were still reported to AUSTRAC for other concerns regarding scams, identification takeover and money laundering.

## OUR RISK MANAGEMENT AND DUE DILIGENCE PROCESSES

Across the Group, we deal with a diverse range of Australian and overseas suppliers and extend credit to a wide variety of individuals and organisations.

We acknowledge there is a risk modern slavery could exist within our business be it in our supply chain, via an organisation we extend credit to, or through the involvement of an individual we extend credit to.

Prompted by a question raised in an internal forum about the supply of the Bank's uniforms, we undertook a deeper dive analysis of our uniform supplier. This work was to ensure that our lead supplier wasn't linked to modern slavery through their supply chain relationships. The outcome satisfied us that the appropriate structures and measures were in place, both those of our lead supplier and those of their suppliers.

This experience further galvanised our work to assess our supply chain for modern slavery risks, and to this end we engaged an external specialist, FRDM Inc., to apply a modern slavery risk lens to supplier assessment and onboarding.

Modern slavery is abhorrent and inconsistent with how we treat people, our organisation's values and our Code of Conduct. It may also present additional reputational and/or financial risks to our business.

Examples of goods or services we access where modern slavery has been identified to be a risk include:

- IT hardware and devices
- Office products and furniture;
- Promotional merchandise;
- Staff uniforms; and
- Low skilled labour such as cleaning and catering.

We recognise this risk is not limited to goods or services sourced from overseas but could also occur within Australia.

When sourcing goods or services from overseas or Australia, all suppliers are subject to our due diligence process. All services provided from an offshore jurisdiction and certain services provided from within Australia, where the presence of slavery or human trafficking is identified as a risk, will be subject to additional due diligence.

In discussions with suppliers, we confirm:

- Where goods or services are provided from i.e. the specific overseas province/state/city.
- If sub-contractors will be used and if so, the sub-contractor's name and details.
- If audits are conducted regarding the presence of slavery and human trafficking and whether audits are conducted by the supplier, or an independent third-party.
- Receipt of a copy from all parties of the most recent audits conducted into the possible presence of slavery and human trafficking.

Our Group Assurance team conducts reviews on demand where Procurement has identified high risk suppliers or conduct of suppliers that trigger a review requirement.

Where modern slavery is identified within a supplier, the Group's Procurement function will work with the impacted business unit to decide on the most appropriate remedy.

Where we have an identified risk within our operations, Group employees have multiple avenues to report identified breaches. Alerts are also sent to the Financial Crime Risk (FCR) team for further investigation. Any factual outcome will be subsequently reported to the relevant authority, including notification to our Regulatory Compliance team.

During this reporting period, no suppliers were identified to require a specific remedy to address modern slavery concerns.

## Assessing the effectiveness of our modern slavery actions

During this reporting period all Group staff were asked to complete annual online compliance training for modern slavery. The completion rate for the year is above 98 percent with management monitoring completion rates across their teams.

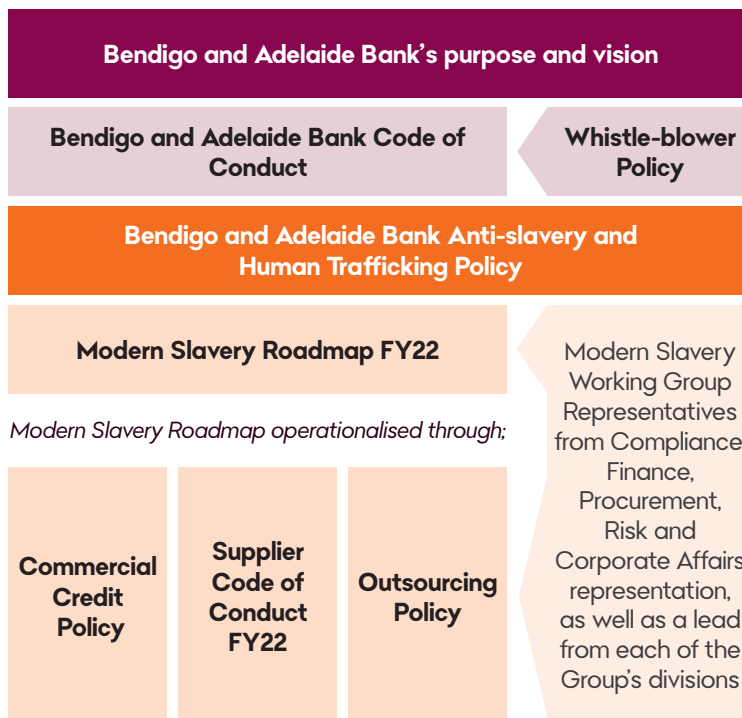
Modern Slavery Reporting is provided to our Operational Risk Committee on a regular basis to help assess effectiveness. It has been observed that it is sometimes difficult for frontline staff to pinpoint this activity, as it's often confused with tax evasion, money laundering or fraud. The key factor however is that our staff continue to report suspicious or unusual activity to our Financial Crimes area, regardless of the perceived threat. Further education and communications will be considered to support our staff to detect this activity and the recent roll-out of new or improved training regarding AML/CTF and fraud is further expected to improve staff awareness.

Whilst there were no reportable supplier issues which would trigger a Group Assurance review, our Procurement monitoring is ongoing and able to respond quickly to isolate and report should further investigation be required.

Our publicly available Customer Feedback Management policy welcomes both Group staff and members of public to record expressions of dissatisfaction or concern. Our operations staff were able to work both confidentially and sensitively to support a member of the public's concerns with regard to an observed situation. Further internal investigation uncovered a suspected child exploitation matter that was promptly reported to the appropriate authorities for investigation and action.

We are committed to continuing to improve our performance on addressing modern slavery. As such, in FY22, we are developing out our Modern Slavery Roadmap, including further measures to assess the effectiveness of actions outlined in the Roadmap.

## Modern slavery governance



### CONSULTATION

During FY20, Group Regulatory Compliance identified related bodies corporate which triggered the consolidated revenue threshold for being a reporting entity under the Australian Modern Slavery Act 2018 (Cth).

A Modern Slavery Working Group was established to engage with a representative of each of the identified entities and to progress the risk assessment work and resultant actions across the Group. This involved regular meetings to discuss, issues, controls and contribute content to the preparation of the joint statement on behalf of all entities

Each reporting entity in the Bendigo and Adelaide Group (as per the list included in the introduction and Appendix to this Statement) participated in the preparation, and publication, of a joint statement on its behalf, being this statement.

The Modern Slavery Working Group continues to be the key engagement and consultation mechanism across the Group in FY21.

### GRIEVANCE MECHANISMS AND REMEDIATION

We seek to identify, prevent, mitigate and account for our adverse impacts related to modern slavery. We provide grievance mechanisms through which stakeholders can raise concerns on modern slavery. And we are committed to engaging in remediation where appropriate.

## OUR POLICIES, STANDARDS AND TRAINING

To support our work in advancing human rights, in addition to our Anti-Slavery and Human Trafficking Policy, we have other policies and procedures that help mitigate the risk of modern slavery across our business. These are detailed below.

### CODE OF CONDUCT

Our Code of Conduct is a statement of our corporate ethics and philosophy, and underpins our business decisions, actions and behaviour. The Code provides clear guidelines to directors and employees, so there is a common understanding of the values and expected standards of behaviour for all. The objectives of the Code are to make sure high standards of corporate and individual behaviour are observed in conducting the business of the Group, and to provide support for those behaviours. Our Code of Conduct applies to all employees and directors of companies in the Group.

### WHISTLEBLOWER POLICY

Our Whistleblower Policy outlines the processes and protections our employees are entitled to if they raise a whistleblower concern, including any in relation to slavery or human trafficking.

This policy aims to provide clarity on:

- The importance of raising employee whistleblower concerns.
- How employees qualify for protection as a whistleblower under the Corporations Act.
- How to raise a whistleblower concern.
- How the Bank will deal with whistleblower concerns.
- Employee rights and protections so they feel safe to speak up.

### ANTI-BRIBERY AND CORRUPTION POLICY

We have an Anti-bribery and Corruption Policy which outlines our commitment not to engage in bribery or corruption and required compliance with State and Federal anti-bribery and corruption laws, including the Australian Criminal Code Act 1995 and Proceeds of Crime Act 2002. Our policy provides clarity in relation to our standards and expectations of conduct to protect the reputation of the Bank and staff.

The Policy covers four key areas:

- Bribes and corruption;
- Gifts and entertainment;
- Political donations; and
- Inaccurate records.

This policy is also reinforced by our Code of Conduct.

### TRAINING

Building employee awareness and comprehension of our Anti-Slavery and Human Trafficking Policy through formal training is crucial to its successful implementation and acceptance across the Group. It also helps improve and increase the identification of instances of possible modern slavery in our supply chain and parts of our operations.

Three separate training modules are available for our staff to complete:

- Mandatory guidance for Bendigo and Adelaide Bank Group employees to help inform broader awareness of modern slavery, the red flags or key indicators to alert of potential risks of modern slavery, and how to appropriately report the matter.
- Specific advice for all lending staff on how to comply with the Act as well as when to report potential instances of modern slavery.
- Additional information included in the Bank's procurement training program specifically targeted at business unit heads and procurement staff that engage with third party suppliers.

### INDUSTRY COLLABORATION AND ENGAGEMENT

We recognise the importance of working with peers and across industry to address modern slavery. To that end, we have participated in the Australian Banking Association's Modern Slavery Working Group, and we are exploring additional avenues for involvement in FY22.

### SUPPORTING THE SUSTAINABLE DEVELOPMENT GOALS

We endorse the ambition of the UN SDGs as a global pathway to end poverty, protect nature and ensure peace and prosperity. We support customers and communities by contributing across four SDG areas (SDG 5 Gender equality, SDG 10 Reduced inequalities, SDG 11 Sustainable cities and communities and SDG 13 Climate action) that are aligned to our material ESG topics. Our work on modern slavery is one part of actioning our commitment.

## CONTINUED COMMITMENT

Our approach to advancing human rights through the prevention of modern slavery is drawn from the Act, our vision, strategy, values and purpose.

We are committed to delivering high standards of corporate governance both in our frameworks and in our policies and practices. We believe this leads to better decision making and outcomes for all stakeholders.

Acting with integrity in the conduct of our business is an important element of our success.

Into FY22, areas for improvement include:

- Connectivity of modern slavery governance into our broader ESG governance
- Development of a Modern Slavery Roadmap, an action plan that outlines what we will be enacting in coming years in relation to modern slavery
- Development of agreed effectiveness measures for our modern slavery actions
- Investigation of further industry collaboration opportunities, for example the Global Compact Network Australia (GCNA) network
- Development of an overarching Human Rights position

Bendigo and Adelaide Bank's Modern Slavery Policy and Roadmap will be reviewed and updated annually.

This statement has been endorsed by the Board of Bendigo and Adelaide Bank.

A PDF version of our Modern Slavery Statement is also available to download on our website.



**Jacqueline Hey**

Chair

8 November 2021



**Marnie Baker**

Managing Director

8 November 2021

## Appendix 1:

Overview of reporting entities, owned or controlled, for whom this statement is prepared.

Company Name	ACN/ABN
Reporting Entities	
BENDIGO AND ADELAIDE BANK LIMITED	11 068 049 178
<b>Bendigo and Adelaide Bank - wholly owned subsidiaries, operating</b>	
<b>Company Name</b>	
<b>ACN/ABN</b>	
AB MANAGEMENT PTY LTD	75 070 500 855
Allsurety Pre-Securitisation Trust	29 152 481 834
Leveraged Equities 2009 Trust	78 985 056 215
Lighthouse Warehouse Trust No. 1	15 064 698 011
Lighthouse Warehouse Trust No. 14	34 093 547 844
Lighthouse Warehouse Trust No. 8	13 598 536 343
Torrens Series 2008-1 Trust	74 251 478 481
Torrens Series 2008-4 Trust	50 866 266 829
Torrens Series 2012-1 Trust	25 971 179 721
Torrens Series 2013-1 Trust	21 576 841 490
Torrens Series 2013-2 Trust	50 810 881 891
Torrens Series 2014-1 Trust	35 228 119 774
Torrens Series 2014-2 Trust	75 825 612 129
Torrens Series 2015-1 Trust	63 853 295 224
Torrens Series 2016-1 Trust	71 287 281 424
Torrens Series 2017-1 Trust	75 378 421 913
Torrens Series 2017-2 Trust	47 373 702 036
Torrens Series 2017-3 Trust	54 585 405 336
Torrens Series 2019-1 Trust	51 131 022 397
Torrens Series 2019-2 Trust	74 594 742 550
BENDIGO FINANCIAL PLANNING LIMITED	81 087 585 073
BENDIGO SUPERANNUATION PTY LTD	23 644 620 128
SANDHURST TRUSTEES LIMITED	16 004 030 737
Adelaide Cash Management Trust	28 169 961 975
Bendigo Conservative Index Fund	98 654 845 651
Bendigo High Growth Wholesale Fund	46 306 558 820
Bendigo Defensive Wholesale Fund	51 531 942 098
Bendigo Growth Index Fund	22 140 804 033
Bendigo Balanced Index Fund	59 963 135 661
Bendigo Defensive Index Fund	69 812 090 194
Bendigo High Growth Index Fund	66 447 514 462
Community Enterprise Charitable Trust	12 102 649 968
Community Enterprise Foundation	69 694 230 518
Youth Foundations Victoria	47 853 957 737

# Modern Slavery Act 2018 (Cth) - Statement Annexure

## PRINCIPAL GOVERNING BODY APPROVAL

This modern slavery statement was approved by the *principal governing body* of Bendigo and Adelaide Bank Limited as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> ("the Act") on 8/11/2021

## SIGNATURE OF RESPONSIBLE MEMBER

This modern slavery statement is signed by a *responsible member* of Bendigo Adelaide Bank Limited as defined by the Act<sup>2</sup>:

Jacqueline Hay - Chair  
Marnie Baker - Managing Director

## 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.	12
b) Describe the reporting entity's structure, operations and supply chains.	5
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.	6-7
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.	3,8-9
e) Describe how the reporting entity assesses the effectiveness of these actions.	10-11
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).*	10
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	4

\* 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.

- 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.
- 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.



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