

Modern Slavery Statement

1. Introduction

Christian Super (**the Fund**) is an Australian superannuation fund that is committed to investing its members' retirement funds ethically, in line with Christian values. We are award winners for impact investing, and our products are certified by Responsible Investment Association Australasia (**RIAA**) for our responsible investing approach.

We invest in companies that care for people and God's creation, who demonstrate sound ethical practices and meet performance standards in their social, environmental and financial stewardship.

Accordingly, we avoid investments in corporations that engage in producing goods or services that have addictive or harmful effects on people, engage in activities that are excessively harmful to the environment, or practices that are predatory or exploitative or which abuse human freedom or dignity.

Through our four pillars of responsible investing, we assess and address social and governance risks in the Fund's investments, including modern slavery.

These strategies include:

- **Negative Screening** – Removing from the investible universe, companies whose business lines and activities do not align with the members' values e.g. labour rights, China screen due to Uyghur forced labour, North Korea screen due to forced labour and oppressive government.
- **ESG Integration** – Integrating environmental, social and governance factors into investment decisions in companies, including assessing modern slavery risk management.
- **Active Ownership and Influence** – Engaging with companies, industries, and governments on various environmental, social and governance issues, and actively exercising proxy voting rights.
- **Impact Investing** – Investing in alternative investments that have a dual aim of a risk-adjusted return, as well as positive environmental and/or social outcomes.

2. Our Structure and Supply Chain

Christian Super is a financial services business providing superannuation products to individuals. Included in these products are investment options, insurances and pension facilities. Christian Super Pty Ltd (ACN 065 040 619) is the Trustee for Christian Super (ABN 66 628 776 348).

Christian Super is the majority shareholder of Brightlight Impact Holdings Pty Ltd (ABN 22 613 311 550), an impact investment management and advisory firm. Brightlight is also an investment manager for the Fund and has been assessed for its management of modern slavery risks under our investment manager due diligence process, discussed below. However, as Brightlight does not constitute a legal subsidiary of the Fund, Christian Super does not undertake any additional monitoring or consultation activities in relation to Brightlight above and beyond those of any other investment manager or service provider.

The supply chain of the Fund includes operational and corporate procurement, and our investment portfolio. We predominantly invest in assets via investment managers, although we also maintain direct holdings. These assets are across a number of asset classes, including listed and private equity, property, infrastructure, fixed income, and others.

Due to the external management of the Fund's holdings via its investment management supply chain, the modern slavery risks extant in the Fund's holdings are predominantly addressed via engagement with managers and, at times, direct engagement with underlying holdings.

The scope of the Fund's operations includes its office and employees. Key suppliers into the Fund's operations include the administrator, custodian, building management and internal auditor.

3. Risks of Modern Slavery and How We are Taking Action

Operations and Operational Supply Chain

Christian Super has robust systems for managing modern slavery risks in our operations. Due to our fund size, the human resources team has strong coverage of the employment status of employees and we ensure that all employment conditions are legally compliant. The supply chain which feeds into our organisation includes suppliers as broad as building management and cleaners, to tea, coffee and gifts. We have surveyed first tier service providers to understand more about the risks in their operations and supply chains, and how they are managing them.

Our procurement practices are an area of higher modern slavery risk, particularly informational technology and food products, on which we are taking action to reduce risks of modern slavery and promote labour rights. The team members involved in procurement are first focusing on food procurement, prioritising sourcing products that are fair trade or from indigenous-owned businesses.

Investment Supply Chain

As a financial service provider, whilst the risks in our operations are low, we face modern slavery risks that can be difficult to identify and address due to the depth of our investment supply chain. Because of our efforts to invest responsibly, we already have systems in place to identify social and governance issues which may indicate modern slavery. We have further enhanced our research into modern slavery risks in our investments by identifying sectors and regions at risk, and are beginning to map our investments to these data points so that the most salient investments at risk can be targeted for action.

Our research shows that the following GICS Industry Groups in which we invest have a higher risk of modern slavery (in alphabetical order) - Commercial & Professional Services, Consumer Durables & Apparel, Consumer Services, Metals & Mining, and Technology Hardware & Equipment.

Our research shows that the following countries in which we invest have a higher risk of modern slavery (in alphabetical order) - Bangladesh, Cambodia, China, Ecuador, Ghana, India, Indonesia, Kazakhstan, Mexico, Nepal, Nigeria, Philippines, South Africa, and Tanzania.

We have engaged with investment managers and any directly held companies on an assessment of their modern slavery management practices, including how they are identifying, preventing and remediating modern slavery in their own business and those that they are linked to.

Through a combination of this supplier engagement and research, we are identifying the most salient risks in our investment supply chain so that our actions can be targeted to address the most concerning risks first. This financial year we have surveyed investment managers as well as assessing our own practices for investment areas managed in-house. Assessment of investment managers will be regularly carried out to maintain a current determination of our supply chain and target actions to where they can be most impactful.

Our due diligence approach to investments has been reviewed. We incorporate questions regarding modern slavery policies and programs into our ESG due diligence questionnaire during the manager/ investment appointment process.

We are also taking action with the broader investment community. At a global level:

- We are members of the **Investor Alliance for Human Rights (IAHR)**, which uses collective action to encourage responsible investment, including targeting companies with unacceptable instances or risks of modern slavery.
- We have joined the **Coalition to End Forced Labour in the Uyghur Region** in response to the continued persecution of Uyghur people in China. This campaign bolsters our existing negative screening of select investments in China, allowing us to engage with companies that continue to operate in the region despite the high likelihood of engaging in forced labour of Uyghur people.

In Australia:

- We are members of the **Australian Council of Superannuation Investors (ACSI)**, which uses collective action to promote strong corporate governance, particularly in the area of addressing modern slavery in supply chains.
- we have joined **Investors Against Slavery and Trafficking Asia-Pacific (IAST)** initiative. Whilst still at the beginnings of its work, the group has already taken a lead to set standards of modern slavery risk management and disclosure by launching the Investor Statement. The Investor Statement is an important step to set expectations so that this significant investment risk is well-managed.

Through these groups, we are able to take an active approach to engaging with companies, and set an industry-wide expectation that companies must go beyond treating modern slavery as a compliance task and make meaningful change on modern slavery in their supply chains.

4. Assessing Effectiveness

Christian Super is well placed to tackle modern slavery in its supply chain due to being a committed responsible investor, however we recognise that we are on a journey to learn more about our supply chain and how we can best engage to reduce the risks and occurrences of modern slavery within it. We are taking an approach of continuous review and improvement, and will use the experience of our internal and external coalition engagements to strengthen our systems.

5. Board Approval of Statement

Christian Super's Trustee Board has reviewed this statement. Based on the procedures performed and the review conducted, the Trustee Board accordingly approves this statement on behalf of Christian Super.



Neville Cox, Board Chair

This statement, issued on 11 March 2022, is prepared as a Modern Slavery Statement by Christian Super as a reporting entity for the purposes of compliance with the Modern Slavery Act 2018 for the financial year ending 30 June 2021. Information on the product issued by Christian Super can be found in the Product Disclosure Statement (PDS). An individual should consider all information contained in the PDS (including information referenced in the PDS which also forms part of the PDS) before making a decision about investing in Christian Super. The information provided in this document is general information only and does not take into account any individual's personal financial situation or needs. The information in this report is based on information available as at the issue date and is subject to change in accordance with changes in Christian Super's operations.