

# Fiducian Superannuation Fund



## Modern Slavery Statement

FY2022

November 2022

## Contents

<b>1 Introduction (Mandatory criteria 1)</b> .....	<b>3</b>
About this Report.....	3
<b>2 About Our Business (Mandatory criteria 2)</b> .....	<b>4</b>
Our Structure.....	4
Our Operations.....	4
Our Supply Chains .....	4
<b>3 Modern Slavery Risks (Mandatory criteria 3)</b> .....	<b>6</b>
Risk Assessment Processes .....	6
Risk Assessment Approach.....	6
Modern Slavery Risk Assessment.....	6
<b>4 Actions to Address Modern Slavery Risks (Mandatory criteria 4)</b> .....	<b>8</b>
<b>5 Assessing the Effectiveness (Mandatory criteria 5)</b> .....	<b>9</b>
<b>6 Consultation Process (Mandatory criteria 6)</b> .....	<b>10</b>
<b>7 Other Information (Mandatory criteria 7)</b> .....	<b>11</b>

# 1 Introduction (Mandatory criteria 1)

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## About this Report

This modern slavery statement is prepared and issued by Fiducian Portfolio Services Limited ABN 13 073 845 931, AFSL 231101 RSE Licence Number L0001144 (**FPSL, Trustee**), as the trustee of the Fiducian Superannuation Fund, ABN 57 929 339 093, SPIN FPS0101AU (the **Fund**), the sole reporting entity.

It covers the financial year ended 30 June 2022.

This document is our second modern slavery statement under the *Modern Slavery Act 2018 (Cth)* (the **Act**) and explains our actions taken to identify, assess and address modern slavery risks in our operations and supply chains.

This statement was approved by the Board of Fiducian Portfolio Services Limited in its capacity as the trustee of the Fiducian Superannuation Fund on 18 November 2022.

## 2 About Our Business (Mandatory criteria 2)

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### Our Structure

FPSL is an Australian incorporated company and the trustee of the Fund. The Fund is a resident regulated superannuation fund within the meaning of the *Superannuation Industry (Supervision) Act 1993*.

The Fund is the reporting entity for the purposes of this modern slavery statement.

FPSL is a subsidiary of the Fiducian Group Limited (ASX code: FID) (**FGL**). FPSL does not own or controls any other entity.

FPSL does not directly employ any staff but has engaged the Administrator to undertake its day-to-day operations, including the development and application of the modern slavery obligations.

### Our Operations

The Fund is distributed to the public through the Fiducian Superannuation Service (the **Service**), which is a public offer superannuation fund. The Service also distributes sub-funds consistent with its contractual arrangements with selected third parties. The Service allows you to accumulate your superannuation savings and obtain a pension in retirement. Investing in superannuation can help you generate a flexible, tax effective income stream during retirement.

The Service encourages Members to seek financial advice prior to investing in the Service, where the Service provides Members with the ability to select from over 60 externally managed investment products.

### Our Supply Chains

FPSL, as the trustee of the Fund, is responsible for the operations of the Fund. To ensure that the operations of the Fund are undertaken in a manner consistent with its legislative obligations, FPSL has outsourced all of the operations of the Fund, where it has a direct relationship with the following entities who provide material services to the Fund (**Tier 1 Entities**):

- (1) The National Australia Bank Limited ABN 12 004 044 937 (**NAB** or **Custodian**) acts as the custodian of the assets of the Fund. The Custodian's role is limited to holding the assets of the Fund as agent of the Trustee. The Custodian has no supervisory role in relation to the operation of the Fund.
- (2) Fiducian Services Pty Limited (**FSL**) ACN 602 437 892 (**Administrator**) has been engaged to provide administration and support services to the Fund. The Administrator provides a range of services to the Fund, including administration, systems, client services, marketing, finance, legal and compliance, risk and distribution opportunities. FSL is a related entity to FPSL as it is also a subsidiary of FGL.

- (3) Superchoice Services Pty Limited ABN 78 109 509 739 provides clearing house services to the Fund to facilitate the receipt and transfer of member's monies.
- (4) Ernst & Young ABN 75 288 172 749 has been engaged by the Trustee to perform internal audit activities in respect of the Funds implementation of suitable compliance measures and operations consistent with the superannuation prudential standards.

All entities that are Tier 1 Entities have their operations within Australia. When engaging with these entities, FPSL has applied its Outsourcing Policy which requires the implementation of a formal contractual arrangement and appropriate due diligence to be undertaken based upon the size, risk and nature of the services being provided to the Fund by the outsourced provider.

Tier 2 Entities have been assessed to be entities that (a) provide goods and services to the Tier 1 entities; and (b) investment products that are included within the Fund. As we further develop and enhance our modern slavery response, further analysis of Tier 2 entities will be undertaken in future years.

### 3 Modern Slavery Risks (Mandatory criteria 3)

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#### Risk Assessment Processes

We are committed to upholding human rights and acknowledge that modern slavery practices and the risks of these could breach our Modern Slavery Policy. We are developing a pro-active approach to modern slavery risks in our operations and supply chains by mapping out our supply chains and undertaking due diligence in identifying, assessing, managing and reporting to mitigate these risks.

#### Risk Management Framework

Our Risk Management Framework (**RMF**) brings together systems, structures, processes and people that identify, manage and monitor risks within Fiducian. The RMF identifies risks associated with achieving strategic objectives and conducting business operations. In formulating RMF, the Board considers optimising risk by having regard to its business strategy, growth plans, resources and the interests of its stakeholders. The RMF includes a Risk Management Strategy, a Risk Appetite Statement, a Risk Register, a designated Risk Management Function and a Quality Control Assurance Program.

The Chief Risk Officer (**CRO**) conducts risk workshops with each Business Unit Head on a quarterly basis. During these workshops, the risks, risk descriptions, the risk controls, inherent risk ratings, residual risk ratings, risk tolerances and risk appetite are discussed. Amendments are made to the risk register to keep the risk register current. In addition, any emerging risks are also discussed. Risk Workshops are also conducted with the Investment Committee, the Audit, Risk and Compliance Committee (**ARCC**) and the Board.

Each Risk Owner also review risks on our risk and compliance system (**TICKIT**). This is where the risk owners confirm that the risk controls remain effective to mitigate the risks and that the risk ratings are appropriate.

The CRO conducts Quality Control Assurance where evidence is sighted to verify that the controls are operating effectively. The CRO monitors and reports risk activities to an independent ARCC who oversees compliance with the RMF.

The Three Lines of Defence Model is fully operational which details essential roles and duties of staff, Risk Function and Internal Audit to implement an effective RMF. A risk-aware culture is fostered and facilitated at the Board Level and cascaded down through all levels of Fiducian, supported by the embedment of the Three Lines of Defence model. There is a clear expectation that all management and employees within Fiducian are responsible for playing their respective roles in risk management effectively.

#### Modern Slavery Risk Assessment

In our first year of considering modern slavery risks, we have separately considered how such risks indicators may impact our business operations. In future years, we will further develop our risk

assessment approach to incorporate modern slavery risks when Risk Owners review the risks within their business unit.

In our first year of considering modern slavery risks, our initial risk assessment focussed on Tier 1 Entities supply chains where we identified that there was a low potential for modern slavery risks. In the FY22, we have expanded our risk analysis to include Tier 2 Entities who the Trustee has engaged to provide service to the Trustee or FSS. The outcome of this analysis was:

1. The inherent risk of failure to monitor and assess Modern Slavery risks is High.
2. The identification of seven controls that facilitate the monitoring and assessment of Modern Slavery risks and an assessment that the application of these controls was currently Effective.
3. On the application of the identified controls, the Residual Risk has been identified as Low. Appropriate and relevant Risk Indicators and Risk Tolerance Limits have been set to ensure that Modern Slavery risks and appropriate managed by FPSL.

## 4 Actions to Address Modern Slavery Risks (Mandatory criteria 4)

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As this is our second reporting period, we set in last year's statement a list of actions to address Modern Slavery Risks. We list below the proposed actions to be undertaken and detail our compliance in undertaking those actions:

- (a) Incorporating modern slavery risks within the Outsourcing Policy, which considers the engagement of external service providers: Completed.
- (b) Formulating a cascading questionnaire for the completion by suppliers: Completed.
- (c) The mapping of Tier 2 Entities and completing a preliminary risk assessment of their modern slavery risks: Partial - Tier 2 Entities were identified and a sub-set of Tier 2 Entities were selected to participate in the completion of a Questionnaire.
- (d) To develop a reporting mechanism to the Audit, Risk and Compliance Committee in respect of modern slavery risks: Partial – reporting occurred on an ad hoc basis.
- (e) To facilitate training for FPSL to better understand what is modern slavery and the risks associated with such practices: Completed.

We plan to enhance our actions in the forthcoming financial year by:

- (a) Continue the project of the mapping of Tier 2 Entities and determine if a specific risk assessment of their modern slavery risks is required for this cohort (or any other cohort);
- (b) Review the process in assessing impacts of modern slavery on Tier 1 and Tier 2 Entities and whether the gathering of information can be completed in alternative ways, apart from a Questionnaire.
- (c) To continue to assess and develop reporting mechanism to the Audit, Risk and Compliance Committee in respect of modern slavery risks.
- (d) To provide further training on modern slavery and the risks associated with such practices.

## 5 Assessing the Effectiveness (Mandatory criteria 5)

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The operations of the Fund are monitored by the following Boards and Committees:

- (a) FPSL Board; and
- (b) Audit Risk and Compliance Committee.

The Fund and FPSL has implemented a three lines of defence model and we will incorporate within our internal audit cycle, as our practices mature, a review of our modern slavery framework, processes and controls.

We have undertaken a review of modern slavery activities of Tier 1 Entities and selected Tier 2 Entities by way of a Questionnaire. This has identified that for those who responded to our requests (46 of 49 entities), those entities were aware of modern slavery issues and the need to consider such risk in their operations. We believe that these positive responses provide confirmation of the effectiveness of our actions as we continue to evolve our consideration of modern slavery risks in our operations.

## 6 Consultation Process (Mandatory criteria 6)

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The Fund (or FPSL) does not own or control any other entities, and therefore, we are not required to respond to this matter at this time.

## 7 Other Information (Mandatory criteria 7)

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We acknowledge that we continue to evolve our response to modern slavery risks within our organisation and these will continue to evolve as we broaden our review in the coming years.

In FY2023 our focus areas are anticipated to be:

- (a) Continue to engage with our Tier 1 Entities and Tier 2 Entities to broaden our consideration of modern slavery risks associated with their businesses and how they impact our operations;
- (b) incorporating modern slavery risks within our Risk Management Framework, especially when Risk Owners are considering risks within their Business Units; and
- (c) to continue to educate Risk Owners to reinforce their understanding of modern slavery practices when engaging with our suppliers.

This statement was approved by the Board of Fiducian Portfolio Services Limited in its capacity as the trustee of the Fiducian Superannuation Fund on 18 November 2022.



Drew Vaughan

Chairperson

Fiducian Portfolio Services Limited as trustee of the Fiducian Superannuation Fund