



Insignia[®]
Financial

Modern Slavery Statement

Insignia Financial Ltd
(ABN 49 100 103 722)

Year ending 30 June 2023

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Message from our CEO

The 2023 Global Slavery Index estimates that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia.¹ Understanding the extent of this and the human rights impacts, Insignia Financial recognises our responsibility to identify and respond to modern slavery risks.

Insignia Financial Ltd is submitting this Modern Slavery Statement (**Statement**) for the period 1 July 2022 to 30 June 2023 (**FY2023**). This joint Modern Slavery Statement is made under section 14 of the *Modern Slavery Act 2018* (Cth) on behalf of Insignia Financial Ltd and the reporting entities identified in the **Appendix**. This Statement outlines the actions taken by Insignia Financial Ltd, the reporting entities and the entities they own or control (collectively '**Insignia Financial**') to assess and address modern slavery² risks in their operations and supply chains.

Insignia Financial takes a risk-based approach to engaging with our supply-chain, aiming to identify and mitigate risks of modern slavery practices. This approach aligns with our maturity plan which focuses on increasing and implementing measures to combat modern slavery within our operations and supply chain.

The Insignia Financial Ltd Board of Directors, on behalf of itself and the other reporting entities covered by this Statement, has reviewed and approved this Statement. As CEO, I hereby authorise the Statement to be signed.



Renato Mota

CEO, Insignia Financial Ltd.

¹ <https://www.walkfree.org/global-slavery-index/country-studies/australia>

² *The Modern Slavery Act 2018* (Cth) defines modern slavery as including the following types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Our structure, business operations and supply chain

Business structure and operations

Insignia Financial has been helping Australians secure their financial future for over 175 years.

During that time, Insignia Financial has grown to become a leading provider of quality financial advice, products and services with \$295.0 billion in funds under management and administration (FUMA) as at 30 June 2023, and around 2 million clients throughout Australia.

Our ambition is to create financial wellbeing for every Australian, which is founded upon our purpose of 'understand me, look after me, secure my future' and our client-led thinking, principles and ways of working that place clients at the centre of everything we do.

The principal activities of Insignia Financial are:

- **Platforms:** Offering a wide range of financial services solutions on superannuation and investments to clients including investors, members, employers and advisers.
- **Advice:** Providing quality financial advice that is accessible, affordable and engaging for Australians; helping clients navigate their way through a range of financial products and services and educating clients to improve their financial literacy.
- **Asset management:** Delivering strong and consistent returns to clients with access to world-leading investment managers across a broad range of highly rated single and multi-manager capabilities and other attractive investment opportunities.

As at 30 June 2023, Insignia Financial has 4,798 direct employees, with 4,791 based in Australia and 7 based in the US. By head count, 4,109 of our employees are permanent full-time workers, 181 are fixed-term/max-term employees, and 422 are permanent part-time. There are 81 employees who are casual workers.

Further information about Insignia Financial can be found at insigniafinancial.com.au.

Supply chain

The assessment of Insignia Financial's supply chain for FY2023 identified that we partnered with 1,140 tier-one suppliers to assist in delivering products and services to our clients.

During FY2023 Insignia Financial spent approximately \$766 million with these suppliers, ranging from large multinational corporations to small businesses. 95% of this expenditure was directed towards Australian-based businesses.

Of the 1,140 suppliers, the majority were service based, including:

- professional, scientific and technical services (44%)
- financial and insurance services sector (15%)
- accommodation and food services (6%)
- rental, hire and real estate services (5%)
- administration and support services (4%), and
- information, media and telecommunication (3%).

92% of all suppliers were based in Australia, which is unchanged from FY2022. Of the non-Australian suppliers, they were distributed across USA and Canada (5.6%), Europe (1.7%) and Asia (0.7%).

Risk of exposure to modern slavery

As Insignia Financial is a financial services provider based in Australia, the direct risk of modern slavery practices occurring within our business operations is considered to be low. However, we recognise that we have indirect exposure to the potential risk of modern slavery practices within our supply chain and through investments made within funds managed by our asset management business.

The risk increases where businesses receiving capital from investments made by Insignia Financial are based in high-risk jurisdictions or are involved in industries known to have a high risk of modern slavery practices.

Since most suppliers based in Australia have a lower inherent risk of modern slavery practices, the risk within our corporate supply chain is also assessed as low.

Examples of high-risk modern slavery sectors for Australia include³:



Services (excluding domestic work)



Manufacturing



Construction



Agriculture (excluding fishing)



Domestic work

Modern slavery risk assessment FY2023

For FY2023, a total of 1,140 corporate suppliers were identified, a significant reduction compared to the 1,706 reported in FY2022. This reduction can be attributed to ongoing supplier consolidation following the purchase of the MLC Wealth business in mid-2021, as well as improved data quality in our supplier base following a review with the assistance of an external data consultant.

A total of 233 suppliers were excluded from further assessment. They were classified as:

- suppliers who received less than \$1,000 for the reporting period and were not in an industry assessed as high risk
- sole traders (including individual contractors)
- government agencies, or
- duplicate supplier profiles in our system.

Considering this, it was determined that Insignia Financial had 907 in-scope corporate suppliers eligible for further assessment regarding modern slavery risks.

For the modern slavery assessment in FY2023, Insignia Financial implemented a new risk-based approach to assess our suppliers, enabling us to prioritise our resources and actions where we can have the most impact.

There were 150 investment manager suppliers providing investment services to Insignia Financial's multi-manager and MySuper investment businesses for FY2023, a slightly lower amount than in the prior year, reflecting the ongoing consolidation of various investment management processes.

We issued tailored modern slavery assessment questionnaires to investment managers who had not responded to the previous questionnaire and to those who had the lowest score in our risk-based assessment of their prior-year responses.

Many of our investment managers now have a contractual requirement to regularly report on their policies for managing modern slavery in their business and supply chains. We expect that this reporting requirement, as part of broader ESG-related reporting requirements, will in time be adopted by all remaining investment managers as we streamline the investment approach across our various APRA-regulated Responsible Entities.

Risk assessment results

Corporate supply chain

The priority for our FY2023 activity, has been to engage with the suppliers who were assessed as high risk based on their inherent risk profile and modern slavery questionnaire responses in our FY2022 assessment. These suppliers were placed on our watchlist, and the Procurement Team worked with various business owners to identify key contacts and seek further information relating to their management of modern slavery risks.

Following the engagement activity, seven of the high-risk suppliers have been removed from the watchlist. Four of these organisations are no longer suppliers, and three have submitted further information on how they are managing modern slavery risks. Five suppliers remain on the watchlist, with the Procurement Team working with relevant business owners to seek further information.

In conjunction with our external data consultant, we applied a new risk-based approach to assessing our corporate supply chain for FY2023. This approach assesses the inherent risk of our corporate suppliers based on industry, domicile country and total spend.

Using this approach, for the initial assessment results across the entire population of Insignia Financial's corporate suppliers were:

- 115 suppliers assessed as medium risk, and
- 1,025 suppliers assessed as low risk.

³ Global Estimates of Modern Slavery: Forced Labour and Forced Marriage International Labour Organisation, Walk Free and International Organisation for Migration, Geneva, September 2022.

Of the 907 in-scope suppliers, the questionnaire response rate was over 42% which is significantly higher than the 14% response rate recorded in the previous year. This increase is attributed to the automation of questionnaire assessment process into our new digital procurement system, as well as a higher level of general awareness of modern slavery requirements.

Following the more detailed assessment of our corporate suppliers, based on the modern slavery questionnaire responses, we identified:

- 21 suppliers assessed as high risk due to their responses, or due to them having a medium inherent risk and not having responded to the questionnaire
- 225 suppliers assessed as medium risk, and
- 199 suppliers assessed as low or negligible risk.

We identified that 462 corporate suppliers have not completed questionnaires, however these suppliers were assessed as having low or negligible inherent risk of modern slavery practices.

Of the responses received by corporate suppliers to the modern slavery questionnaire, no instances of modern slavery were identified (that is, suppliers who have had a record of any adverse association to modern slavery).

Throughout FY2024, our focus will be on engaging with high and medium risk corporate suppliers to gain further information and assurances on how they are managing modern slavery risks.

High risk suppliers will remain on the watchlist within the modern slavery risk register until we are satisfied that they are managing these risks. We will also continue to leverage our new procurement technology to gather information from suppliers who have not yet completed the modern slavery questionnaire.

Fund manager assessment

The overall response rate to investment manager modern slavery questionnaires sent out in FY2022 was 72%. Our focus in FY2023 has been on those investment managers who did not provide a response to the questionnaire sent out in the prior period, and those 18 managers who had the lowest score in our risk-based assessment of their prior year response.

Ten investment managers continued to fail to complete our questionnaire. We are focussing our efforts on engaging with the investment managers where we assess our modern slavery risk is higher, to receive responses to our questionnaire. A lack of response will trigger a review of the commercial relationship with the investment manager.

Through the additional reporting and assessment of the 18 lowest scoring investment managers, we identified the following:

- A typical position from the investment managers is to identify zero exposure to the high-risk geographies and business activities and, in absence of local modern slavery legislation, have no formal policy position. In such instances, future engagement will rely more on an examination of the specific asset class and investment managers business model accompanied with education on modern slavery risks and our obligations where we feel this is not fully understood.
- Common challenges when engaging with our investment managers relate to the nature and structure of their businesses and the sometime esoteric nature of the underlying asset class. For instance, investment managers who are effectively funds-of-funds may find it difficult to interrogate the holdings of the underlying investment managers and often have limited ownership rights that they can leverage. The modern slavery risk exposure of asset classes such as insurance linked securities can often be difficult to determine. In both instances this is made harder when the investment manager operates in a jurisdiction that does not have relevant legislation. In these instances, we will work with the investment managers to help them fulfill our reporting expectations.

In the FY2024 period it is our intention to again send modern slavery questionnaires to our investment managers.

It is our current intention to uplift the modern slavery-related regular due diligence that we undertake on our investment managers as part of the ESG approach to responsible investment. This will mean more detailed questions being asked more regularly and may result in the modern slavery questionnaire and risk assessment becoming embedded in the broad annual investment manager due diligence, rather than remaining a standalone modern slavery risk assessment exercise.

Our actions to mitigate modern slavery risks

Operational governance and employee relations

Insignia Financial is primarily an Australian-based financial services organisation, and our employee profile is largely made up of professionals who are directly employed with us. Our employees' terms and conditions are outlined in employment contracts that comply with relevant employment legislation.

Insignia Financial's Code of Conduct (**Code**) outlines the expected values and standards of behaviour applicable to all employees and is linked to our client-focused purpose. The Code, along with a series of complementary corporate policies mentioned below, is designed to support ethical behaviour and the selection of professional and reputable suppliers and service providers.

Insignia Financial also has a Whistleblowing Program in place to provide a secure channel for our people to report concerns related to our business operations and practices. It ensures that concerns will be reviewed and/or investigated objectively and confidentially. Appropriate corrective action will be taken where deemed appropriate.

Employee awareness and training

Insignia Financial provides training and tools for our employees to assist them to identify, mitigate and report on modern slavery issues.

All employees must complete the modern slavery general awareness training annually. The training incorporates the Modern Slavery Policy and provides directions to follow if a suspected or actual case of modern slavery is observed. For FY2023, our employees achieved a 100% completion rate for this training module.




We also offer a modern slavery intranet site that is accessible to all employees. The site contains information on modern slavery, outlines our modern slavery obligations and links to our Modern Slavery Statement, Modern Slavery Policy and related procedures. The intranet site also encourages employees to send any suspected modern slavery issues to our dedicated modern slavery mailbox.

Frameworks and policies

Addressing modern slavery risk relies on us building strong risk frameworks across our organisation to identify and address these issues. We apply a 'three lines of accountability' model to the identification and management of these issues.

'Three lines of accountability' model

Insignia Financial adopts the 'three lines of accountability' model to govern risk management activities across the organisation. The model is represented as follows:

 <p>First line Business management</p>	<p>Business units are accountable for identifying, managing and owning the risks inherent in the products, services, activities, processes and systems they are responsible for.</p>
 <p>Second line Risk Management function</p>	<p>The independent Risk Management function, led by the Chief Risk Officer, is responsible for the design, maintenance and ongoing development of the Risk Management Framework.</p> <p>Risk Management supports the first line in its risk management responsibilities by providing independent challenge and oversight, as well as specialist risk advice. This includes assessing the use and adequacy of frameworks, systems, processes and behaviours, to form a view of how well risk and compliance is managed across the Group.</p>
 <p>Third line Independent assurance</p>	<p>Internal audit provide a third line of independence and oversight of the first and second-line activities. This oversight may include other independent reviews commissioned by the Board.</p>

The key policies and statements related to addressing these modern slavery risks include:

- Modern Slavery Policy (**MS Policy**)
- Procurement Policy
- Whistle-Blower Policy
- Anti-Bribery and Anti-Corruption Policy
- Diversity and Inclusion Policy, and
- Responsible investment statements and policies.

Modern Slavery Policy

Insignia Financial's MS Policy outlines our approach to reducing the risk of modern slavery practices within our operations and supply chain. As compliance with the MS Policy is mandatory for all employees, it forms an important accountability mechanism.

At the time of this report, the MS Policy is being reviewed and updated to include the new risk assessment management framework and accountabilities across the business. The updated MS Policy is expected to be endorsed and implemented in FY2024.

Responsible investment statements and policies

Responsible investment is the way in which we apply Environmental, Social and Governance (**ESG**) principles to our investment and superannuation business.

The Responsible Investment Policy Statements form part of Insignia Financial's responsible investment framework and defines the role that responsible investment considerations play in the assessment, selection and monitoring of externally appointed investment managers. It also outlines the framework for identifying and managing ESG risks and opportunities across several managed investment schemes.

These statements outline several ESG risks considered as part of this framework, including:

- human capital management
- labour standards
- modern slavery
- diversity, equity and inclusion, and
- workplace health and safety.

As part of our responsible investment framework, the above risk considerations are applied when appointing new fund manager suppliers and in the ongoing assessment of existing fund managers.

Boards

Both the corporate and fiduciary boards of Insignia Financial consider ESG risks.

The Insignia Financial Ltd Board (the Board) recognises that effective risk management is essential for sound governance and vital to the continued growth and success of Insignia Financial. It bears ultimate responsibility for the oversight of our risk management framework.

The Board has established a Group Risk and Compliance Committee (**GRCC**). The GRCC's primary objective is to monitor and receive assurances that:

- an appropriate and effective risk management framework is in place for identifying, assessing, mitigating and monitoring material risks
- appropriate and effective compliance policies, procedures and frameworks are in place for identifying, monitoring and managing relevant obligations
- operations are conducted within the scope of the abovenamed policies, procedures and frameworks, and
- management devotes relevant, appropriate and proper attention to compliance and risk management issues.

The Head of ESG is responsible for providing updates to the GRCC, via a quarterly ESG Risk Report. This report includes updates on modern slavery risks, as well as mitigation actions and activities aimed at enhancing Insignia Financial's monitoring of these risks.

Modern Slavery Working Group

During FY2023, Insignia Financial's cross-functional Modern Slavery Working Group formulated an action plan to guide our progress against our stated modern slavery maturity plan. The working group assisted with the development of this Modern Slavery Statement. The group also collaborated with our external data consultant to improve supplier data for better assessment of modern slavery risks within our supply chain. The working group continues to work through the action plan.

Corporate supply chain management

In October 2022, Insignia Financial implemented a new digital procurement system, enhancing our ability to manage corporate suppliers and improve the end-to-end procurement process. We also updated our outsourcing policies to upgrade supplier management and due diligence processes, enabling more rigorous future evaluations of supplier performance.

The Procurement Uplift Project, initiated in early 2023, focuses on enhancing efficiency, identifying cost savings, strengthening supplier relationships and addressing supply chain risks including disruptions and compliance issues. The project supports compliance with the *Modern Slavery Act 2018* Cth.

As part of suppliers' onboarding to this system they are now required to complete a modern slavery assessment questionnaire.

Supplier data

With the implementation of our new digital procurement system throughout FY2023, Insignia Financial has worked to reconcile data relating to the tier one corporate suppliers we engage. This work included the removal of duplicate and expired supplier accounts, resulting in a significant reduction in number of suppliers. In addition, ongoing rationalisation of suppliers across our business post the acquisition of the MLC Wealth business continues to contribute to this reduction.

With the assistance of our external data consultant, we have commenced work to automate the industry categorisation of our suppliers, as well as leveraging external data sources to augment our understanding of modern slavery risks within our supply chain. We are also working to integrate modern slavery register data into the system to refine our monitoring process. This data will allow us to identify suppliers who have registered a Modern Slavery Statement and direct our resources to engaging with suppliers that need to improve their practices around modern slavery.

Improvement planning

Insignia Financial is continuing to take a risk-based maturity approach to managing and assessing modern slavery risks in our supply chain.

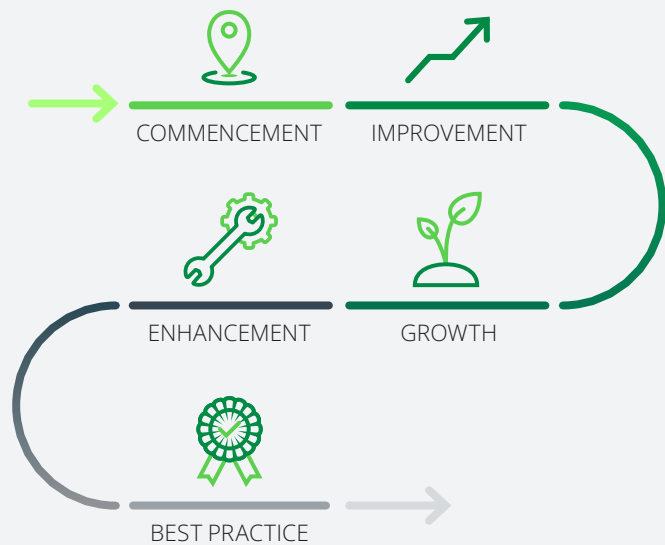
This approach aims to reduce our exposure to high-risk suppliers, seeks to increase confidence in the modern slavery data within our business and improve awareness and accountability for recognising and addressing modern slavery risks across all levels of our business.

Our five year maturity plan, which commenced in FY2020 (Year 1), has guided our efforts in improving our processes, systems and business awareness in addressing modern slavery risks.

Maturity plan

The aim of the maturity plan is to ensure that Insignia Financial continually improves its ability to meet its commitments to reduce the risks of modern slavery practices by identifying and taking action where required. It focuses on developing better supplier relationships and creating awareness and accountability as well as ensuring a mature and adaptive compliance culture within the organisation.

The maturity plan sets out a 5-year timeframe to achieve best practice in identifying and addressing modern slavery issues.

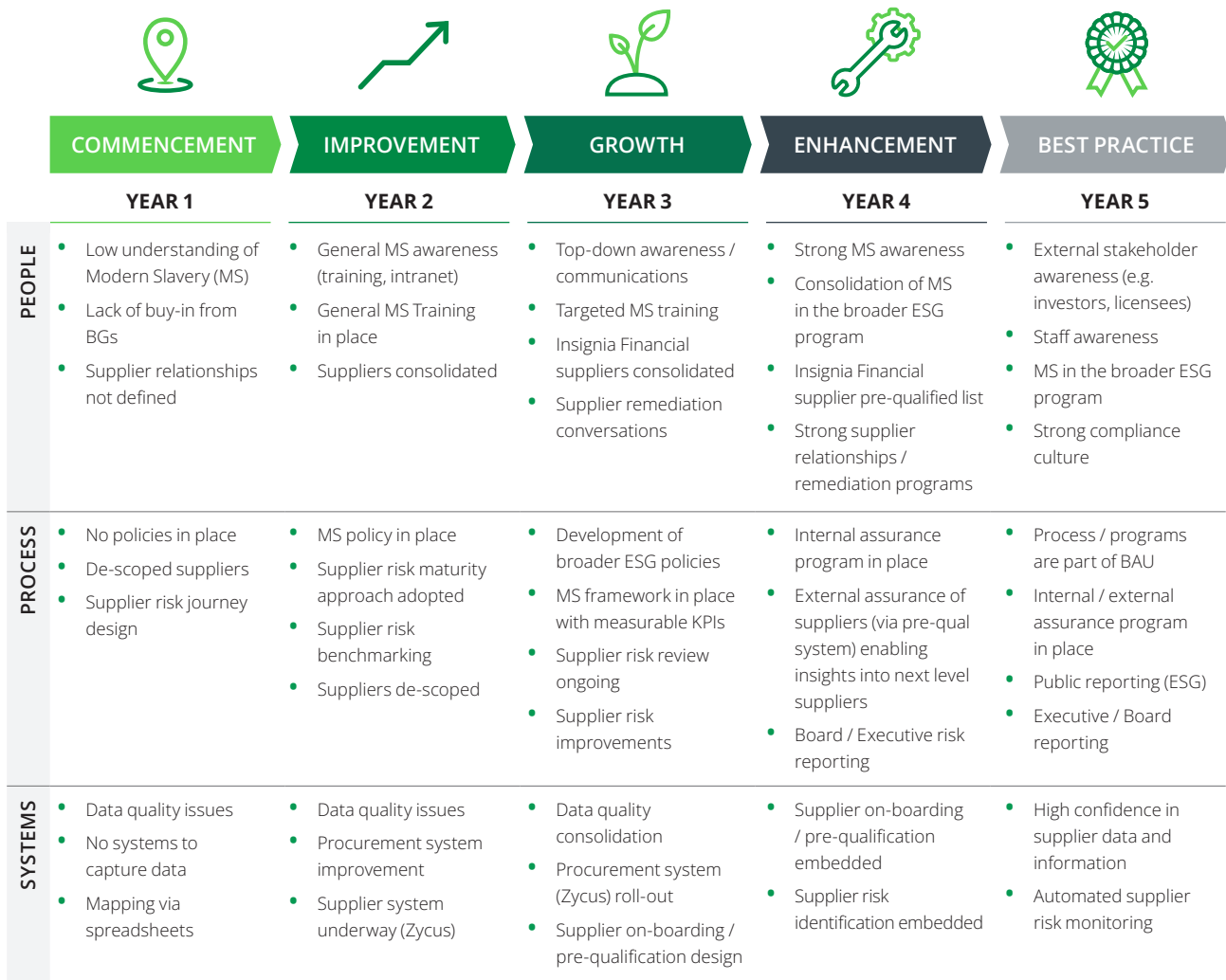


Our review of the effectiveness of actions

Progress against the maturity plan

Our five year maturity plan, which commenced in FY2020 (Year 1) and was updated in 2021, has helped us measure our progress against key milestones to address the risk of modern slavery practices across the three areas of **People, Process and Systems**.

As outlined in the diagram below, Year 4 of the plan corresponds to FY2023.



In FY2023, we made progress towards achieving our stated objectives in Year 4 of our maturity plan, as well as some of our Year 5 objectives, these include:



People

- The Insignia Financial Procurement Team has strengthened our remediation program through actively engaging with high-risk suppliers and managing the modern slavery watchlist.
- The integration of modern slavery uplift is now part of our broader enterprise ESG strategy and program of work.
- Our suppliers are pre-qualified for modern slavery risk through the completion of a modern slavery questionnaire on our digital procurement system.
- We have achieved a 100% completion for our modern slavery general awareness e-learning module. This includes all client-facing employees and employees dealing with suppliers across Insignia Financial.



Process

- Quarterly ESG Risk Reports, including considerations relating to modern slavery, were delivered to the GRCC, which serves as the delegate committee of the Insignia Financial Ltd Board responsible for monitoring enterprise risks.
- The Procurement Uplift Project was initiated in early 2023 and is focused on enhancing efficiency, strengthening supplier relationships and addressing supply chain risks including disruptions and compliance issues. The project supports compliance with the *Modern Slavery Act 2018* (Cth).
- We completed work to align Responsible Investment Statements and enhance them to include broader ESG considerations, including modern slavery, within the asset management investment process.
- Insignia Financial's Supplier Code of Conduct is scheduled to be finalised and published by the end of FY2024.
- Annual ESG reporting includes information on Insignia Financial's assessment of modern slavery risks.



Systems

- A new digital procurement system was implemented in October 2022, allowing Insignia Financial to better monitor our corporate supply chain and engage with suppliers.
- We engaged with an external data management consultant to undertake a program of work to cleanse our supplier data, aiming to ensure accurate and up-to-date supplier data was entered into the new procurement system.
- Planning has commenced in collaboration with our external data consultant to automate the modern slavery risk assessment process for all corporate suppliers leveraging internal data from our digital procurement system data as well as external data sources. This development will enable us to identify and manage modern slavery risks across our supply chain more efficiently.

Further actions

We recognise that not all items from year 3 and 4 have been completed in the maturity plan, so Insignia Financial is working to address the following actions:

Set up framework to deliver on internal and external assurance relating to assessment and management of suppliers, enabling insights into next level of suppliers.

Implement measures relating to the modern slavery monitoring framework to develop KPI's.

Insignia Financial remains committed to improving our processes and systems to identify and manage modern slavery risks.

Through the refining of our modern slavery risk assessment framework and work to automate the risk assessment process for suppliers within our new digital procurement system, we can align our resources to focusing on areas where we can have most impact.

Our ongoing engagement with industry bodies like the Financial Services Council (FSC) and the Responsible Investment Association Australasia (RIAA) informs our approach to enhancing our response to modern slavery risks within our corporate supply chain and investment portfolios.

Our consultation process

This Modern Slavery Statement has been approved by the Board of Insignia Financial Ltd.

In preparing the FY2023 Modern Slavery Statement, Insignia Financial Ltd consulted with each of the reporting entities covered by this Modern Slavery Statement and with applicable entities they own or control. The respective boards of the applicable entities covered in this statement were provided an update on progress towards meeting the Insignia Financial modern slavery maturity plan, and the reporting entities were asked to approve their inclusion in this Statement.

In the preparation of this Statement, input was also received from the cross functional Modern Slavery Working Group, which includes representatives from our corporate legal, risk and procurement functions.

Other information

While COVID-19 lockdowns finished during FY2022, Insignia Financial acknowledges the impact that the virus continues to have on supply chains globally. Despite no material impact being identified during this assessment period, there may be latent impact yet to be identified.

Insignia Financial continues to monitor and engage with suppliers in respect of any developments that COVID-19 may have on their operations.

Appendix – Reporting entities

This is a joint Modern Slavery Statement under section 14 of the Modern Slavery Act 2018 (Cth). It covers the following reporting entities:

Companies

- Insignia Financial Ltd (ABN 49 100 103 722)
- MLC Wealth Ltd (ABN 97 071 514 264)
- Australian Wealth Management Limited (ABN 53 111 116 511)
- OnePath Custodians Pty Ltd (ABN 12 008 508 496)
- IOOF Investment Services Ltd (ABN 80 007 350 405)
- NULIS Nominees (Australia) Ltd (ABN 80 008 515 633)
- MLC Investments Limited (ABN 30 002 641 661)
- IOOF Investment Management Ltd (ABN 53 006 695 021)

Super funds

- MLC Superannuation Fund (ABN 40 022 701 955)
- MLC Pooled Superannuation Trust (ABN 89 787 168 280)
- MLC Super Fund (ABN 70 732 426 024)
- Oasis Superannuation Master Trust (ABN 81 154 851 339)
- Retirement Portfolio Service (ABN 61 808 189 263)
- IOOF Portfolio Service Superannuation Fund (ABN 70 815 369 818)

Trusts

- OneAnswer – OnePath International Shares Index Trust (ARSN 101 400 757)
- OneAnswer – OnePath Australian Shares Index Trust (ARSN 104 467 469)
- OneAnswer – OnePath Balanced Index Trust (ARSN 142 352 592)
- OnePath Australian Shares Index Pool (Unregistered)
- OnePath Global Shares – Large Cap (Hedged) Index Pool (Unregistered)
- OnePath Global Shares – Large Cap (Unhedged) Index Pool (Unregistered)
- Strategic Australian equity fund (ARSN 133 312 820)
- Strategic International Equity Fund (ARSN 133 308 219)

- IOOF MultiSeries 70 (ARSN 118 190 613)
- IOOF MultiSeries 50 (ARSN 614 698 314)
- IOOF Balanced Investor Trust (ARSN 165 464 228)
- IOOF MultiMix Balanced Growth Trust (ARSN 130 097 059)
- IOOF Multi Series Wholesale Australian Equities Trust (ARSN 614 051 428)
- IOOF Multi Series Wholesale International Equities Trust (ARSN 614 051 384)
- MultiMix Wholesale Australian Shares Trust (ARSN 093 527 345)
- MultiMix Wholesale International Shares Trust (ARSN 093 528 511)
- WM Sector – Global Equities (Unhedged) Trust (ARSN 167 805 012)
- Horizon 4 Balanced Portfolio (ARSN 087 446 375)
- Passive Global Share Trust (ARSN 136 061 357)
- Diversified Australian Share Trust (ARSN 087 780 532)
- Diversified Global Share Trust (ARSN 087 779 173)
- Diversified Global Share Trust with Currency Hedged (ARSN 087 779 520)
- Integrated Separately Managed Account (ARSN 138 086 889)
- Multi-Manager Global Share Trust (ARSN 616 970 588)
- WM Pool – Equities Trust No. 1 (Unregistered)
- WM Pool – Equities Trust No. 20 (Unregistered)
- WM Pool – Equities Trust No. 33 (Unregistered)
- WM Pool – Equities Trust No. 39 (Unregistered)
- WM Pool – Equities Trust No. 74 (Unregistered)
- WM Pool – Equities Trust No. 75 (Unregistered)
- WM Pool – Global Equities Trust No. 6 (Unregistered)
- WM Pool – Australian Equities No. 2 (Unregistered)
- WM Sector – Australian Equities Trust (Unregistered)

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