



Our Modern Slavery Statement

**FOR THE 2021-22
FINANCIAL YEAR**

About this statement

This Modern Slavery Statement (**Statement**) is given by UniSuper Management Pty Ltd ABN 91 006 961 799, AFSL No. 235907 (**USM**), being an entity wholly owned by UniSuper Limited ABN 54 006 027 121, ASFL No. 492806 (**USL**) in its capacity as trustee of the fund UniSuper ABN 91 385 943 850 (**Fund**), for the 2021-22 financial year.

The Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (Act) and has been approved by the Boards of USL in its capacity as trustee of the Fund and USM on 30 November 2022. The registered office for both USL and USM is Level 1, 385 Bourke Street, Melbourne, Victoria 3000.

The reporting entities covered by the Statement are USM and the Fund where it has had consolidated revenue of at least \$100 million for the relevant financial year. As the Fund takes modern slavery seriously, it chooses to prepare a Statement even where it is not a reporting entity under the Act.

Except where the context otherwise requires, the Fund, USL and USM are referred to throughout the Statement as, 'UniSuper', 'we', 'us' or 'our'.

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Introduction

Forced labour and related practices exist in the operations or supply chains of most businesses in every region of the world, including Australia. UniSuper believes every person has the right to freedom, and to be safe and respected. We're deeply committed to upholding human rights across our internal operations and supply chains, understanding our labour supply chain risks, and improving our management of these risks. In this third edition of Our Modern Slavery Statement, we look at how we've responded to the risks of modern slavery in our internal operations and supply chains over the year to 30 June 2022.

Modern slavery risk reporting in Australia is relatively new, and we expect our practice and statements will continue to evolve and demonstrate progress, in line with proposed changes to the *Modern Slavery Act 2018*, currently being reviewed by the Government.

UniSuper fully supports the Act, which requires certain businesses and entities that meet a revenue threshold (annual consolidated revenue of more than \$100 million) to report on the risks of modern slavery in their operations and supply chains, and the entities they own or control. Reports must cover the actions taken to address those risks, and how the effectiveness of those actions has been assessed.

The Act defines modern slavery to include eight 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 (situations where children are subjected to slavery or similar practices, or engaged in hazardous work).

We've taken meaningful steps in 2021-22, consistent with the expectations set out in the:

- United Nations' Guiding Principles on Business and Human Rights
- Australian Council of Superannuation Investors, and Responsible Investment Association Australasia's

joint Modern Slavery Reporting – Guide for Investors (November 2019)

- Australian Border Force's Commonwealth Modern Slavery Act – Guidance for Reporting Entities.

Specifically, in providing the Statement, we've:

- described our structure, internal operations, and supply chains (page 4)
- identified the risks of modern slavery practices in our internal operations and supply chains (page 5)
- taken action to assess and address those risks and mapped out some of our intended actions for the future (page 7)
- assessed the effectiveness of our actions (page 13)
- described the process of consultation we've engaged in within UniSuper (page 15).

While our review of modern slavery risks is ongoing, we'll strive to get further insights so we can take more meaningful steps. We will:

- continue to strengthen and refine our response to future reporting cycles
- better understand and improve our processes for identifying and managing modern slavery risks
- improve awareness of modern slavery among employees and key business partners
- anticipate the evolving nature of modern slavery risks and our responsibility to respect human rights, including during times of uncertainty and challenge.

Signed by:



Peter Chun
Chief Executive Officer
UniSuper Management Pty Ltd



Ian Martin
Chairman
UniSuper Limited

How we monitor and manage the risks of modern slavery

<h2 style="margin: 0;">Modern Slavery Working Group (MSWG)</h2> <ul style="list-style-type: none"> ▪ Stays attuned to developments and emerging modern slavery risks ▪ Considers additional guidance ▪ Provides advice and reports to the FRAC 	<h2 style="margin: 0;">Financial Risk & Audit Committee (FRAC)</h2> <ul style="list-style-type: none"> ▪ Actively monitors and manages the risks of modern slavery in our internal operations and supply chains ▪ Engages with key business areas
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Highlights FY22

<h4 style="text-align: center;">PROCUREMENT</h4> <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="width: 30%;"> <p>Approximately</p> <h1 style="font-size: 2em;">95%</h1> <p>of goods and services sourced from Australian-based enterprises.</p> </div> <div style="width: 30%; text-align: center;">  </div> <div style="width: 30%;"> <p>3% sourced from the USA.</p> <p>2% elsewhere.</p> <p>Just 16 initially assessed as 'higher risk' out of thousands of suppliers.</p> </div> </div>	<div style="text-align: center;">  </div> <h4 style="text-align: center;">TRAINING & CULTURE</h4> <p style="text-align: center;">We educated and empowered people to call out concerns of suspected modern slavery practices.</p>
<h4 style="text-align: center;">OUR INVESTMENTS</h4> <p style="font-size: 1.5em; font-weight: bold;">>70%</p> <p>UniSuper investments managed in-house.</p> <p>External managers are carefully selected and monitored.</p> <div style="text-align: right;">  </div>	<div style="text-align: center;">  </div> <h4 style="text-align: center;">FRAMEWORKS, POLICIES AND PROCEDURES</h4> <p style="text-align: center;">We continued to embed modern slavery risk management into operational systems and processes. Our overall exposure to modern slavery risk is considered lower risk.</p>
<h4 style="text-align: center;">COLLABORATION & PARTICIPATION</h4> <div style="text-align: center;">  </div> <p style="text-align: center;">We continued collaboration with key investor groups, co-investors and other industry bodies to share knowledge, ideas and help each other to do better.</p>	<h4 style="text-align: center;">ENGAGEMENT</h4> <div style="text-align: center;">  </div> <p style="text-align: center;">We reviewed our internally managed investment portfolio and suppliers to identify general areas of modern slavery risk.</p>

Our structure, operations and supply chains

Structure

USL is the incorporated trustee of the Fund. It is the sole shareholder of USM in its capacity as trustee of the Fund and beneficially holds these shares on behalf of the members of the Fund. USL also owns or controls a number of entities whose sole purpose is to hold particular investments of the Fund. Most of these entities have the same registered office as USL, a few have a registered office elsewhere in Australia and one has a registered office in New Zealand. No people are employed by any of these entities.

USM provides administration and investment management services to USL. USM also operates UniSuper Advice, which is licensed to deal in financial products and provide financial advice. UniSuper Advice financial advisers and support staff are employees of USM.

The USL Board comprises 11 directors (eight representative directors and three independent/nonrepresentative directors). Further information about our directors can be found on our [website](#). The USM Board comprises 12 directors replicating those of the USL Board, with the addition of another director who is the Chief Executive Officer of USM, Peter Chun.

Internal operations

UniSuper is the complying super fund for the higher education and research sector and is now open to all Australians. We're one of Australia's largest industry super funds with over 500,000 members and \$110 billion in funds under management.

The day-to-day administration of UniSuper is managed by USM. The executive leadership team is committed to achieving its purpose: to provide great retirement outcomes for our members. The team operates in line with annual performance objectives and reports to the USL Board. More information is outlined in our annual report and is available on our [website](#).

We have a national presence with more than 900 employees working in Melbourne, Sydney, Adelaide, Brisbane, Canberra, Hobart and Perth, either in one of the UniSuper offices or on-campus at one of our university-based employers.

Our internal operations include operating superannuation products, administering all products internally, providing inbuilt benefits and offering external insurance to members, providing general and personal financial product advice to members and spouses via UniSuper Advice, managing more than 70% of UniSuper's investments internally, and selecting, monitoring, and allocating funds to our external investment managers.

Further details about our internal operations (including our internally managed investments) are explained in the [Appendix](#).

Supply chains

Our supply chains include our externally managed investments and goods and services generally supplied to us, including to support our internal operations.

Further details about our supply chains are explained in the [Appendix](#).

COVID-19 impact

We acknowledge the ongoing social and economic impacts of the COVID-19 pandemic continue to increase the risk of modern slavery practices within the financial services industry, as well as our suppliers' operations and supply chains. Since the outbreak, we have complied with workplace health and safety requirements in Australia and carried out our identification and assessment activities to identify risks of modern slavery practices within our internal operations and supply chains. We've also continued our direct engagement with companies to discuss human rights and supply chain risks.

Risks of modern slavery practices

Modern slavery focuses on risk as it relates to people. Risk to people incorporates concepts of severity of modern slavery practices, likelihood of occurrence, as well as the extent of the effect, in terms of the number of people affected and over what period.

Internal operations

We're strongly committed to ensuring compliance with all workplace health and safety requirements applicable to our places of work (including any remote working arrangements). We recognise our responsibilities are to provide, so far as is reasonably practicable, a safe working environment to our people without risks to health and wellbeing, in accordance with the applicable statutory requirements.

We're committed to:

- working safely
- providing a workplace free from harassment, discrimination, and bullying
- acting ethically and lawfully in all business conduct
- engaging with stakeholders respectfully and honestly
- building sustainable communities through providing local jobs, developing local skills and local business opportunities.

Our work is guided by our UniSuper values which are an integral part of the way we do things and a framework for our shared expectations. They can be found on our website. Our values are: we're better together, we genuinely care for our members, and we have a passion for outcomes.



Better together



Genuine care



Passion for outcomes

We consider our potential exposure to modern slavery risk in respect of internal operations to be low. However, we recognise our internally managed investments is an area of focus in respect of modern slavery. In our reviews of external managers, we discuss their Environmental, Social and Governance (ESG) approach, including their approach to identifying and managing modern slavery risks. We consider the manager's holdings in securities in regions or industries which have higher risk of modern slavery, and discuss with them, the engagements they've had on these issues.

Further details about modern slavery risks identified in our internal operations (including our general approach to managing modern slavery risks in our internally managed investments) for the 2021-22 financial year are contained in the [Appendix](#).

Supply chains

We consider our overall exposure to modern slavery risk in respect of our supply chains to be of generally lower risk. However, we recognise some aspects of our supply chains may be subject to a higher risk of modern slavery.

Further details about the areas of modern slavery risks identified in our supply chains (including our understanding of how our external investment managers are managing modern slavery risk in our externally managed investments) for the 2021-22 financial year are contained in the [Appendix](#).

Our actions to assess and address the risks

FY 2022

In 2021-22 we upheld many of our actions from the previous financial year and improved on those actions. The actions we took in the 2021-22 financial year included:

Internal operations

- **Continuing the Modern Slavery Working Group**
The Modern Slavery Working Group (MSWG) continued carrying out its responsibilities by staying informed and advising the Financial Risk & Audit Committee (FRAC) on any developments in modern slavery risks, considering additional guidance released by government and leading industry bodies and preparing UniSuper's modern slavery statement for the 2021-22 financial year.
- **Monitoring and managing the risks of modern slavery in the FRAC**
We continued to monitor and manage the risks of modern slavery in our FRAC and facilitated engagement and feedback between key areas of our operations (such as risk and compliance, finance (procurement & facilities), investments and legal). The FRAC meets on a regular basis to report on the management of modern slavery risks as they arise from time to time, with reports regarding the management of modern slavery risks provided to the FRAC on a quarterly basis at a minimum.
- **Developing and updating our frameworks, policies and procedures**
We assess the effectiveness of our engagement activities and compliance with our policies and procedures regularly. Our existing risk management framework and associated policies were again reviewed to further embed modern slavery risk management into existing operational systems and processes.
- **Training and culture**
Modern slavery information was provided to all staff as part of the rollout of our second Modern Slavery Statement. We've maintained the internal whistle-blower policy and procedure, and provided the whistle-blower hotline to our employees, contractors and suppliers so they can feel safe to freely raise concerns regarding suspected modern slavery practices.

- **Continuing modern slavery risk analysis in our ESG processes**

We continued last financial year's integration of modern slavery risk analysis into the existing ESG risk processes for our internally managed portfolios. These assessment processes allowed us to focus on due diligence with higher risk suppliers and prioritise modern slavery engagement activities.

- **Engaging directly with companies we invest in**

This year we continued to engage directly with companies to discuss human rights and supply chain risks. These discussions include a focus on their approach to identifying potential areas of risk, investigations undertaken to follow up possible issues in their supply chain and processes for early detection and monitoring of risks.

Example

As part of our regular engagement with companies in our internally held portfolio, we met with Seek, an operator of online employment platforms in Australia, New Zealand, Hong Kong, South-East Asia, Brazil and Mexico. Seek is one of our top 50 ASX listed holdings. The Company's 2021 Modern Slavery Statement detailed ongoing work undertaken, and more detailed disclosures including on its supply chains in Asia and Latin America, as well as due diligence processes to assess modern slavery risks for candidates across employment platforms, especially in SEEK Asia.

OUR ACTIONS TO ASSESS AND ADDRESS THE RISKS

- **Contributing to and engaging with investor groups**

We continued collaborating with various investor groups such as the Australian Council of Superannuation Investors (ACSI) and United Nations' Principles for Responsible Investment (PRI) during the 2021-22 financial year. We are active members of these and other collaborative bodies and participate in various forums in which companies, affected workers, industry bodies and other relevant experts discuss modern slavery and supply chain issues.

In our unlisted airport assets (Sydney and Brisbane), we have collaborated with co-investors on a range of ESG issues, including workplace relations. We are satisfied that there are no issues which would meet the threshold for modern slavery, but we continue to monitor these issues as part of our ESG due diligence approach.

Supply chains

- **Engaging with our external investment managers**

In 2021, we requested all our external investment managers (across all geographies and asset classes) to complete our biennial Investments ESG and Modern Slavery Questionnaire (Investments MS Questionnaire) and held subsequent discussions based on this data to gain a better understanding of their processes to assist us identify and assess risk when managing our investments. In 2022, we conducted our regular check-ins with our external managers where we assess their ESG approach. This modern slavery due diligence was conducted in conjunction with our broader due diligence process on managers' ESG performance and processes as well as specific requests focussing on their respective modern slavery risk management. Arising from our engagement, we became aware that some of our external managers hold securities which had possible exposure to the Chinese province of XinJiang that was the subject of media commentary regarding alleged modern slavery concerns. We had detailed discussions with these external managers to assess their processes for dealing with modern slavery issues in these securities. The external managers reported their engagements with these companies and are satisfied that modern slavery concerns are being managed in their respective supply chains. Where UniSuper had concerns, it re-assessed its position and took action to reduce its exposure.

- **Assessing supplier risk and engaging with select suppliers**

UniSuper's procurement function identified goods and services suppliers to engage with this year as part of its assessment. We included suppliers that were identified as being at a higher risk of having modern slavery practices within their operations and supply chains and continue to engage and monitor suppliers which UniSuper considers to be most strategic and important to its operations. See the Appendix for the enterprise-wide assessment methodology and process undertaken to identify these suppliers. As part of the process, these suppliers were encouraged to complete our Procurement Modern Slavery Questionnaire (Procurement MS Questionnaire) to help inform our future engagement with these suppliers in respect of modern slavery risks.

- **Incorporating modern slavery contract provisions**

We have incorporated provisions for dealing with modern slavery risk and reporting in our contract templates and advocated to incorporate these provisions in select contract negotiations with higher risk suppliers.

FY 2023

At the time of publishing, the Modern Slavery Act is being reviewed by the Attorney General. UniSuper maintains a keen interest in the Government's proposal to establish an Anti-Slavery Commissioner and any potential changes in law – including the introduction of any new measures to improve compliance and the operation of the Act. During this financial year, we're committed to undertaking the following actions:

Internal operations

- **Corporate social responsibility**
A new internal role has been created to influence, shape, and reinforce our vision to be a responsible corporate citizen. The Manager, Corporate Social Responsibility will be tasked with co-ordinating, defining and promoting a well-rounded and consistent view of our socially responsible approaches across our business and our ongoing modern slavery risk management and compliance.
- **Policy, procedure, and framework**
We continue to evolve relevant policies and documentation and consider the incorporation of modern slavery risk into our Risk Management Framework.
- **Ongoing review and improvement of our processes**
We continue to review actions taken and, where appropriate, improve our due diligence, risk management, training and supplier engagement systems and processes to ensure modern slavery risks are effectively managed and mitigated.
- **Introduction of enhanced tools and analysis**
UniSuper will be engaging service provider Fair Supply to complete an independent assessment of modern slavery risks in our supply chains and investment portfolios. The risk assessment will enable us to determine and identify our top modern slavery risks based on industry and location – with the results to be used for further analysis and to implementation additional oversight in these areas.
- **Review of integrated modern slavery risk**
On 1 December 2022, Australian Catholic Superannuation and Retirement Fund merged with UniSuper. Following the merger, we'll be reviewing any changes to modern slavery risk across our supply chains, investments and operations.

Supply chains

- **Supplier awareness and due diligence**
We will undertake further analysis of the supplier questionnaire responses received in our externally managed investments and procurement functions for the 2021-22 financial year so we can better understand the extent of modern slavery practices within their operations and supply chains. Where higher-risk suppliers and vendor-managed suppliers have undertaken actions to address modern slavery risks, we'll work with them to monitor progress.
- **Ongoing monitoring, assessment, and supplier relationship management**
We plan to strengthen our supplier relationship management practices to support ongoing due diligence and compliance. We'll continue to review suppliers with a higher risk of modern slavery practices in their operations or supply chains. We'll also continue to engage with higher risk suppliers and vendor-managed suppliers. We'll analyse responses to better understand the extent of modern slavery practices within our suppliers' operations and supply chains.
- **Industry collaboration**
We plan to work with other organisations within our industry to make a greater impact and create a greater voice on the issue of modern slavery. This includes other superannuation funds and industry peers.

OUR ACTIONS TO ASSESS AND ADDRESS THE RISKS

- **Use of technology**

We plan to procure and implement a new tool, Fair Supply, to better understand our modern slavery risks. We'll explore opportunities to take action based on the insights garnered from the tool.

- **Modern slavery contract provisions**

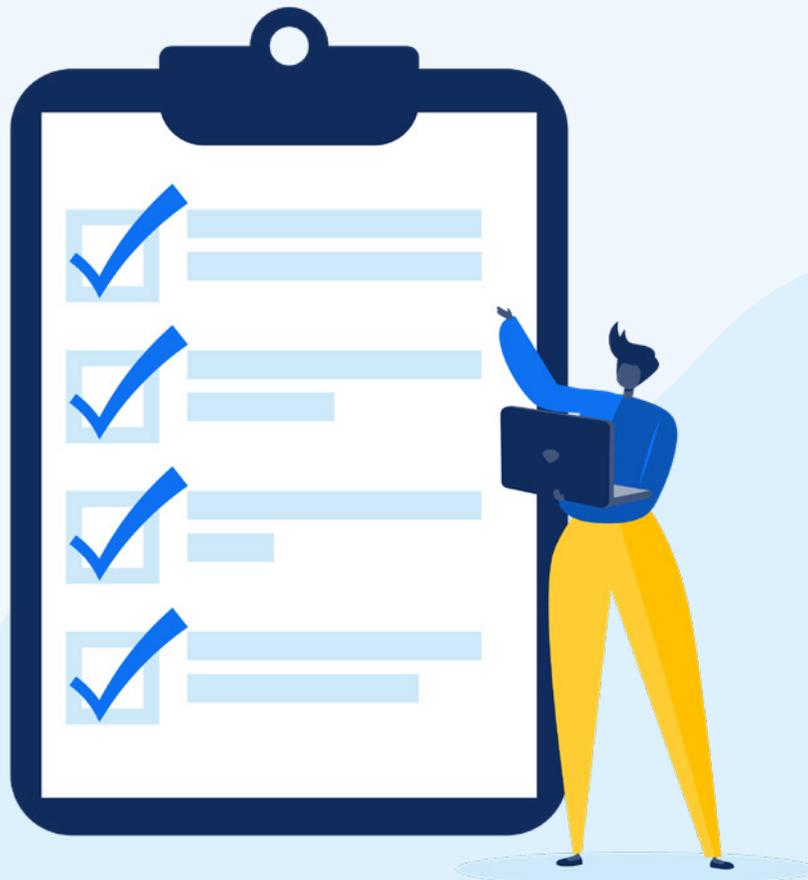
We'll continue to incorporate provisions dealing with modern slavery risks and reporting in our contract templates and press for these provisions to be incorporated in contract negotiations with higher risk suppliers.

- **Remediation**

If we become aware of potential modern slavery practices occurring in our operations or supply chains, we will take appropriate steps to ensure the matter is addressed and, where necessary, remediated. The remedial action we take will depend on the circumstances.

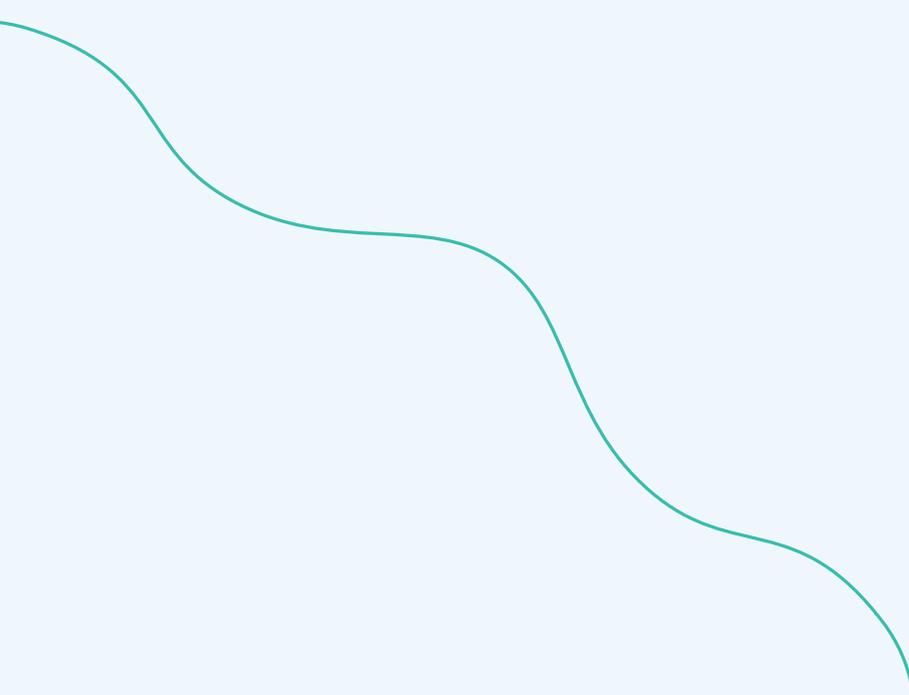
- **Accountability assessment**

We'll explore remedy pathways based on peer benchmarks and advocate for an industry approach.



FY2024 and beyond

For the 2023-24 financial year and beyond, we're considering the following actions to assess and address modern slavery risks within our internal operations and supply chains:

- To work with existing and new suppliers of goods and services to continue to raise awareness and mitigate modern slavery risks within their operations and supply chains.
 - Remediate any identified instances of modern slavery in operations and supply chain via our incident management process.
 - Expand modern slavery risk analysis in investment portfolios and address high risk areas in investments, as well as ongoing collaboration with industry partners as part of a responsible investment approach.
 - Develop and refine risk assessment of supply chains, including in-depth analysis of high-risk suppliers in procurement supply chain and establish a risk-based approach to determine likelihood of greatest harm.
 - Evolve metrics (and potentially use key performance indicators) to better monitor the effectiveness of our actions to identify and address modern slavery risks in our operations and supply chains.
- 

How we assess the effectiveness of our actions

We're committed to assessing the effectiveness of our actions in addressing the risks of modern slavery practices.

During the 2021-22 financial year we continued to improve our framework for identifying, addressing, and assessing modern slavery risks.

Internal operations

INTERNAL INVESTMENTS

Investor awareness and knowledge of modern slavery issues in ASX listed companies continues to evolve with modern slavery reporting now in its third year. We have also participated in various investor briefings and seminars on modern slavery issues which has provided us a broader perspective on the complexities and breadth of issues around workplace practices and how they might indicate modern slavery risk. We have heard from several experts in this area as well as alleged victims of modern slavery operating in the supply chains of listed companies.

Our regular engagements with companies on ESG issues now includes modern slavery discussions. Our focus in these discussions extends beyond the technical definition of modern slavery and encompasses broader workplace relations issues such as wage underpayment and excess overtime. We see this approach as similar to the way workplace safety considerations have extended from a narrow focus on physical injuries to near misses, incident root cause analysis and mental health considerations.

Supply chains

GOODS AND SERVICES

In relation to goods and services procured by UniSuper, we make the following observations.

We continue to use the Procurement MS Questionnaire which we adopted in the previous period. This is a more optimised and appropriate modern slavery assessment for procured goods and services and was developed in conjunction with a relevant industry body and is more appropriate for the type of services we procure.

The Procurement MS Questionnaire has enhanced our ability to report and monitor supplier progress with modern slavery actions. This includes suppliers conducting their own due diligence, carrying out education and awareness with their employees, having in place contractual requirements for their suppliers and producing their own modern slavery statement. The optimised questions align with the actions we use to measure our suppliers' progress.

UniSuper has systemised its approach to managing modern slavery supply chain risk. We have adopted a governance tool that enables us to survey our suppliers, capture responses and manage any actions from one system.

The tool also enables us to construct customised questions to send to suppliers where we wish to assess a specific area. We issued customised questionnaires to all 41 suppliers that formed our assessment in the previous period. From these responses, we have observed an improvement in the level of commitment to modern slavery actions in our supply chains during this

reporting period. There has been a strong commitment from some suppliers where actions are lacking to make improvements over the next 12 months. Having implemented the above changes to our modern slavery procedures, we expect to measure and report on the level of improvements in the next reporting period.

We have also encountered instances where a number of suppliers have not provided a response, or their response was less substantial than what we expected. We are continuing to engage with these suppliers.

EXTERNAL INVESTMENTS

We conduct a comprehensive assessment of the ESG approach of any new asset manager we appoint. This includes an initial ESG questionnaire combined with an interview with representatives of the manager including investment and ESG professionals. We also conduct regular meetings with our managers on an ad hoc basis as required.

We also ask our managers to complete the ESG questionnaire on a two-year cycle, which we did in 2021. For this questionnaire, we included questions on their modern slavery approach, which encompassed identification of risks and processes for remediating and preventing incidents in their investment portfolios and supply chain. This process was used as part of our assessment of our external managers for this report.

Our consultation process

We're committed to developing and maintaining a robust, group-wide response to modern slavery.

USM developed this Statement in consultation with USL as trustee of the Fund and many of the entities that USL as trustee of the Fund owns or controls. A list of the entities that USL owns, or controls is contained in the Fund's full audited accounts for the 2021-22 financial year. You can request a copy of this by calling [1800 331 685](tel:1800331685).

In preparing this Statement, the relevant directors of USL as trustee of the Fund and many of the entities and officers of USL, USM and many of the entities that USL owns, or controls were consulted and provided with an opportunity to review the Statement prior to approval.

The Modern Slavery Statement was prepared by the MSWG and reviewed by the internal Regulatory Due Diligence Committee.



Appendix – Identifying our modern slavery risks

AREA	MODERN SLAVERY RISKS IDENTIFIED
<i>Internal operations</i>	
Internal investments	<p>Over 70% of our funds under management are managed internally. On an overarching thematic review, our internally managed investment portfolio includes both active and passive investments in equity markets, property, private equity, and infrastructure across numerous countries. There is a wide range of investment related activities that can vary on a day-to-day basis. These activities include:</p> <ul style="list-style-type: none"> ▪ the formulation and monitoring of investment objectives and strategies ▪ the selection, appointment, and ongoing management of investment managers, custodians, and other service providers ▪ the selection and ongoing management of direct investments ▪ the calculation and analysis of investment returns ▪ the production and verification of investment information before release to members. <p>Our Core Investment Governance and Risk Management Framework document outlines and refers to the various systems, structures, policies, processes, and personnel in relation to investment-related activities, including the generation of returns to meet investment objectives and the monitoring and management of investment risk.</p> <p>As a responsible investor, we assess ESG factors across every investment we make. We seek to understand the ESG issues of our investments to gain greater insights into our investment decisions and understand the risks and opportunities of our investments.</p> <p>One of our priority ESG themes is workforce issues, incorporating modern slavery and supply chains. We've adopted a risk-based approach, using both geographic and sectoral exposures of our investments.</p> <p>During the 2021-22 financial year, we undertook a high-level thematic review of our internally managed investment portfolio and suppliers to identify general areas of modern slavery risk.</p> <p>Generally, our investments are mainly in developed markets, dominated by Australia. Our international holdings are mainly in listed equities and fixed interest domiciled in developed countries, with low exposure to developing countries (mainly Asia). While our geographic exposure to high-risk countries is therefore low, we also consider our exposure to industries with higher risks of modern slavery.</p> <p>In relation to assessing our investments, we focussed on ASX listed companies in the consumer staples, consumer discretionary and transportation sectors, and included meetings with executives or board members. We covered issues such as real estate investment trusts' monitoring of workplace conditions for cleaning and security staff, underpayments of employees, supply chain monitoring (particularly in the horticulture sector), audit outcomes and disclosure.</p>

APPENDIX

AREA	MODERN SLAVERY RISKS IDENTIFIED
<i>Internal operations</i>	
Other investment service providers (e.g. custodians, brokers, data providers, valuers)	We did not consider the potential modern slavery risks within this area to be high. They involve the provision of specialised professional services and are provided predominantly from Australia. We will look to assess and address any possible risks in a future reporting year.
Operating superannuation (accumulation and pension) products	We did not consider the potential modern slavery risks within this area to be high. We will look to assess and address any possible risks in a future reporting year.
Administering all superannuation (accumulation and pension) products	We did not consider the potential modern slavery risks within this area to be high. We will look to assess and address any possible risks in a future reporting year.
Providing inbuilt benefits and offering external insurance to members	We did not consider the potential modern slavery risks within this area to be high. We will look to assess and address any possible risks in a future reporting year.
Providing general and personal financial product advice to members and their families via UniSuper Advice	We did not consider the potential modern slavery risks within this area to be high. We will look to assess and address any possible risks in a future reporting year.

AREA	MODERN SLAVERY RISKS IDENTIFIED
<i>Supply chains</i>	
Goods and services	<p>The assessment of our supply chains connected to products or services procured by UniSuper were considered on a tier one basis. The vast majority of the reporting entities' suppliers of goods and services were not suppliers at higher risk of involvement with modern slavery.</p> <p>Overall, on a headcount and tier one basis, approximately 95% of our suppliers of goods and services were located or carrying on an enterprise in Australia, 3% in the United States and the remainder elsewhere.</p> <p>Our suppliers (and types of services obtained) included:</p> <ul style="list-style-type: none"> ▪ custodians, brokers, research providers and external investment managers (investment services) ▪ professional services firms (accounting, audit, advisory) ▪ marketing of branded goods ▪ telecommunications (internet, telephone, computing, data storage) ▪ facilities and premises (real estate) ▪ logistics and freight suppliers (postage and couriers) ▪ industry and professional organisations (subscriptions, memberships) ▪ information technology companies (software, data services, technical services) ▪ recruitment and human resources firms (human resources) and ▪ office-related suppliers (cleaning, catering, stationery). <p>Higher risk suppliers</p> <p>In 2021-22 we continued to focus on suppliers where annual spend is above \$20,000. While we acknowledge that the risks of modern slavery concern the risks posed to humans (irrespective of the level of supplier spend), focusing our assessment in this way has enabled us to prioritise suppliers where we have the greatest influence and can drive further commitment.</p> <p>Where we look to source goods in a category that is classified as high risk for modern slavery, additional due diligence checks are conducted, and suppliers are assessed against modern slavery risk factors.</p> <p>In determining which aspects of our supply chains were at a higher risk of modern slavery, an enterprise-wide assessment of spend and supplier data was conducted alongside consideration of factors which include:</p> <ul style="list-style-type: none"> ▪ global slavery index data ▪ qualitative assessment in conjunction with industry bodies ▪ industry commentary on modern slavery ▪ a de minimis spend threshold of \$20,000. <p>Out of the thousands of suppliers to our operations, the assessment process initially yielded a result of 16 'higher risk suppliers'. Throughout the 2021-22 we only onboarded two new suppliers in categories that are considered higher risk and conducted due diligence on these suppliers accordingly.</p>

APPENDIX

AREA	MODERN SLAVERY RISKS IDENTIFIED
<i>Supply chains</i>	
Goods and services cont.	<p>Strategic and most important suppliers</p> <p>In addition to identifying our 'higher risk suppliers', we also included 25 suppliers who we consider to be our most strategic and important suppliers hence where we potentially have greater leverage to achieve a higher level of commitment. These suppliers are identified based on an annual assessment factoring in criticality to our business and spend. We expect the identification of these suppliers may change from year to year.</p> <p>Our due diligence processes and engagement, and future developments with suppliers will be, conducted alongside our dedicated procurement function which manages the contracting, delivery and relationship process end to end alongside the relevant business unit within UniSuper.</p>
External investments	<p>Less than 30% of our investments are managed externally.</p> <p>For modern slavery risk purposes, risks are potentially present in our external managers as suppliers and in relation to the assets being managed.</p> <p>For this Statement, we continue to gain an understanding of our external managers' processes for identifying, assessing and managing modern slavery risks (on a geographical risk and sector risk basis) when managing our investments. We do so as part of our regular due diligence on managers' ESG performance and processes as well as specific requests focussing on their modern slavery risk management.</p> <p>We did not consider the potential modern slavery risks with external investment managers as tier one suppliers to be high, however, we will look to assess and address any possible risks in a future reporting year and continue to report our progress annually.</p>
Employment agreements for USM employees and contractors	<p>We did not consider the potential modern slavery risks within this area to be high. We will look to assess and address any possible risks in a future reporting year.</p>
Professional advisers (e.g. accounting firms, audit firms, law firms)	<p>We did not consider the potential modern slavery risks within this area to be high. The services provided to us are predominately located in Australia. We will look to assess and address any possible risks in a future reporting year.</p>
Incidental ad hoc supplier agreements entered at a business level on a repetitive basis.	<p>We did not consider the potential modern slavery risks within this area to be high. The extent of any such engagement would have been below a materiality threshold (otherwise the supply would have gone through the procurement process - described in the 'key suppliers' row of this table). We will look to assess and address any possible risks in a future reporting year.</p>

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