



# Modern Slavery Policy

December 2024



**THAT'S A PLUS.**

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## Introduction

Host-Plus Pty Ltd (Trustee) is the Trustee of the Hostplus Superannuation Fund (Fund) and the Hostplus Pooled Superannuation Trust (PST) (collectively referred to as 'Hostplus').

Hostplus is committed to addressing modern slavery risk throughout all aspects of its business operations, including both operational and investment activities and expects its suppliers and Investment Managers to uphold similar standards. The Trustee acknowledges its responsibility to identify, assess and address potential areas of modern slavery risk in all its forms.

Modern slavery involves serious exploitation including human trafficking, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour (serious child exploitation, including through enslavement or exposure to dangerous work) and deceptive recruiting practices.

The purpose of this Policy is to:

- confirm the Trustee's commitment to addressing modern slavery; and
- provide a framework of overarching principles and guidance through which the Trustee will seek to ensure that modern slavery risk management is part of the day-to-day operation of Hostplus.

Hostplus will comply with all applicable laws and regulations aimed at preventing and addressing modern slavery and human trafficking, including its annual reporting obligations under the *Modern Slavery Act 2018* (Cth) ('the **Act**'). Hostplus respects internationally and domestically recognised human rights standards such as:

- The United Nations Universal Declaration of Human Rights; and
- The International Labour Organisation's Declarations on the Fundamental Principles and Rights at Work.<sup>1</sup>

Hostplus is committed to continually improving how it identifies, assesses and addresses potential modern slavery risks within its operations and supply chains, deepen its collaboration with relevant industry groups and engage in relation to addressing modern slavery risk on a long-term basis.

## Scope

This Policy applies to all Hostplus Directors, employees, agents, business partners, contractors and third-party suppliers. It encompasses three key aspects of the Trustee's direct and indirect activities:

- **the Trustee's direct operations**, including in its personal capacity and in acting as trustee for Hostplus Superannuation Fund (**the Fund**) and Hostplus Pooled Superannuation Trust (**the PST**) beneficiaries. These activities are directly conducted by the Trustee, such as employment of staff and working conditions in Hostplus offices.
- **the operations supply chain**, which includes not only direct (Tier 1) suppliers to Hostplus (e.g. cleaning contractors or stationery suppliers), but also deeper tiers of Hostplus' supply chain.
- **investments**, which includes external funds managers and the entities in which Hostplus invests.

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<sup>1</sup> The categories under the ILO Declaration on Fundamental Principles and Rights at Work are: freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect for employment and occupation.

Hostplus' suppliers are also expected to comply with the Supplier Code of Conduct (Appendix 1). Where practicable, such compliance will be required (and enforceable) as a specific contractual obligation, depending on the terms of the specific supplier contract.

## **Related documents**

This Policy should be read in conjunction with the following:

- Code of Conduct Policy
- Conflict Management Policy
- Third Party Management Policy
- Fitness and Propriety Policy
- Fraud and Corruption Policy
- Responsible Investing Policy
- Material Outsourcing Policy
- Remuneration Policy
- Risk Management Policy
- Risk Management Strategy
- Risk Appetite Statement
- Whistleblower Policy

## **Direct Operations**

Hostplus is committed to ensuring that its workplaces are free of any kind of modern slavery practice, and any kind of practice that unacceptably elevates the risk of such practices potentially occurring.

Hostplus makes the following minimum commitments in relation to all aspects of its direct operations and employment practices:

### Basic rights

Hostplus will ensure that all work is undertaken voluntarily and appropriately remunerated. Workers are free to terminate their employment with Hostplus' in accordance with an employment agreement provided in a language that the worker's is reasonably proficient in and can practically understand.

### Ban on recruitment fees

The payment of any recruitment fees by workers (or prospective applicants) to Hostplus (or any agent retained, directly or indirectly, on behalf of Hostplus) in connection with obtaining (or attempting to obtain) employment at Hostplus is strictly prohibited.

### No official worker document retention

Hostplus shall not retain originals of any worker's government issued identification documents, passports, work permits, travel documents, or other official material unless such retention is expressly required by an applicable law.

### Communication of employment rights

Hostplus shall clearly explain, and set out in writing, all key information for workers relating to pay structure and pay periods. This is to be communicated in a language that the worker's is reasonably proficient in and can practically understand. All remuneration is to comply with applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Hostplus will ensure that no workers' hours exceed applicable laws relating to maximum permissible work periods.

### Humane working environment

Hostplus will not use or threaten to use harsh and inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

### Additional protection for juvenile employees

All children are to be protected from economic exploitation in any workplace over which the Hostplus has control or oversight. In addition to fully protecting all other worker rights and freedoms, should Hostplus employ staff under the age of 18, it will never require them to perform work that may jeopardise their health or safety having regard to their age, maturity, and ordinary life experience.

### Worker Rights of Association

Hostplus shall in no way impede or discourage workers' rights to form and join trade unions of their own choosing. Workers can bargain collectively and engage in peaceful assembly. Workers are also to be entirely free to choose to refrain from engaging in any such activities.

## **Operations Supply Chains and Investments**

Hostplus will identify and assess potential areas of elevated modern slavery risk in its operations by conducting appropriate and regular risk assessments. This covers both Hostplus' operations supply chains and its investments. The subsequent due diligence activities undertaken, will vary depending on the nature and extent of potential modern slavery risk factors.

Hostplus' core expectations of its suppliers in relation to modern slavery issues are set out in its Supplier Code of Conduct (Appendix 1). Hostplus expects its suppliers to abide by that Code, and to work collaboratively and transparently with Hostplus if potential issues under the Code arise.

Hostplus expects its investment managers to conduct appropriate due diligence on investee companies, including to ensure that potential areas of elevated modern slavery risk in investment approaches are being appropriately mitigated.

## **Roles and Responsibilities**

<b>Role</b>	<b>Responsibilities</b>
<b>The Board</b>	The Board is accountable for the approval of this Policy and an approval of the annual Hostplus Modern Slavery Statement.
<b>Chief Risk Officer</b>	Policy owner, accountable to CEO and Board for reviewing the application of this Policy and ensuring that the content, approval and publication of Hostplus' Modern Slavery Statement occurs in accordance with the Act.

Role	Responsibilities
	<p>Responsible for the integration of modern slavery risk management into general risk management frameworks and for training on risk management and governance.</p> <p>Responsible for the delivery of the annual Hostplus Modern Slavery Statement.</p>
<b>Risk &amp; Compliance Committee (RCC)</b>	<p>The RCC oversees the effective implementation of this Policy. It reviews the Modern Slavery Statement and endorse it for the Board's approval.</p>
<b>Modern Slavery Steering Committee</b>	<p>The Modern Slavery Steering Committee is responsible for leading the Hostplus' efforts to address modern slavery risks internally, ensuring compliance with annual reporting requirements stipulated by the Modern Slavery Act 2018.</p>

## Training and Awareness

All employees will be provided with training in relation to the Modern Slavery Policy when commencing with Hostplus, and on an annual basis. Training is compulsory and must be completed within set time frames. Completion is managed by the People, Performance and Culture Team.

## Policy Non-Compliance and Exemptions

Hostplus directors, officers and employees are expected to promptly report any actual or suspected incidences of modern slavery at Hostplus or its suppliers, including complying with all disclosure duties to law enforcement authorities under applicable legislation.

Concerns can be raised under the Whistleblower Protection policy.

Non-compliance with this Policy should be reported to the Policy Owner and managed in accordance with the Incident and Breach Management Policy.

Exemptions to this Policy may be granted on an exceptional basis. All exemption requests must be made in writing and provided to the Policy Owner for their review and approval, prior to the exemption taking effect.

## Policy Review

This Policy must be reviewed and approved at least every two years by the Policy's Highest Approval Authority.

All changes to this Policy must be made in writing and summarised within the Document Control Information section of this Policy.

Material changes to this Policy can only be made by the Policy Owner, with the written approval of the Highest Approval Authority.

Non-material changes to this Policy may be made at any time with the written approval of the Policy Owner. Non-material changes include:

- Minor working, numbering or grammatical changes for clarity/syntax.
- Changes in role titles to reflect organisational changes.

- Changes to names or references (policy, process, committee name changes).

## Appendix 1 – Supplier Code of Conduct

# Hostplus Supplier Code of Conduct

## (Addressing Modern Slavery Risk)

### 1. Introduction and objectives

Hostplus condemns all forms of modern slavery. It is committed to conducting procurement in a manner that mitigates potential risks of modern slavery and seeks to work collaboratively with its Suppliers to achieve this aim.

Modern slavery involves serious exploitation including human trafficking, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour (serious child exploitation, including through enslavement or exposure to dangerous work) and deceptive recruiting practices.

Hostplus' approach to addressing modern slavery risk is governed by the principles in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Convention on the Rights of the Child, the International Labour Organisation's Fundamental Conventions and the Children's Rights and Business Principles.

This document establishes Hostplus' expectations of suppliers of goods and services to Hostplus (including their subsidiaries, affiliates, and subcontractors).

### 2. Supplier requirements

Hostplus seeks to work collaboratively with its Suppliers to reduce and address modern slavery risks. Suppliers are encouraged to maintain frank two-way communication with Hostplus, including any issues arising from implementing this Code. Hostplus seeks to working positively with Suppliers to identify opportunities for improvement.

Hostplus expects its Suppliers to comply with all applicable local and international laws and regulations relating to worker protections, safety and wellbeing.

#### *Basic rights*

Suppliers should ensure that all work is undertaken voluntarily and appropriately remunerated. Workers should be free to terminate their employment in accordance with an employment agreement provided in a language that the worker can understand.

#### *Recruitment fees and document retention*

Suppliers should not:

- require payment of any recruitment fees by workers (or prospective applicants) to the Supplier (or any agent retained, directly or indirectly, on behalf of the Supplier)
- retain originals of any worker's government issued identification documents, passports, work permits, travel documents, or other official material (unless expressly required by law).

#### *Communication of employment rights*

Workers need to receive clear written explanations of all key information relating to pay structure and pay periods in a language that the worker can understand. All remuneration should comply with applicable wage laws, including those relating to minimum wages,



overtime hours and legally mandated benefits. Suppliers shall ensure that no workers' hours exceeds applicable laws relating to maximum permissible work periods.

#### *Humane working environment*

Suppliers should not use or threaten to use harsh and inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

#### *Additional protection for juvenile employees*

All children are to be protected from economic exploitation in any workplace over which the Supplier has control or oversight.

In addition to fully protecting all other worker rights and freedoms, Suppliers employing workers under the age of 18 must not require them to perform work that may jeopardise their health or safety having regard to their age, maturity, and ordinary life experience.

#### *Worker Rights of Association*

Suppliers shall not impede or discourage workers' rights to form and join trade unions of their own choosing. Workers can bargain collectively and engage in peaceful assembly. Workers are also to be entirely free to choose to refrain from engaging in any such activities.

### **3. Monitoring and evaluation**

Hostplus expects its Suppliers to:

- manage their operations and supply chain in a manner that complies with this Code and with all applicable laws, rules and regulations.
- provide appropriate grievance procedures for workers and affected stakeholders to report any concerns relating to potential modern slavery practices without fear of retribution.
- address, in a timely manner, any adverse impacts on human rights and/or working conditions, arising from any action that the supplier has caused or contributed to.
- implement and maintain due diligence activities in their direct operations and supply chain to ensure alignment with this Code. Due diligence should be proportionate to Suppliers' overall risk and operating context.

This Code may be incorporated as an express term or condition of a contractual arrangement or other legal agreement between Hostplus and a Supplier. Its adoption and enforceability (including rights of suspension and termination in the event of material breach) are to be subject to the specific terms of the agreement with the Supplier.

Alleged breaches of this Code may be reported under Hostplus' Whistleblower and will be handled in accordance with this policy.

Suppliers that are reporting entities under the *Modern Slavery Act 2018* (Cth) or equivalent foreign legislation are expected to fully meet their obligations under such reporting regimes.