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CEO AND CHAIR MESSAGE





On behalf of the Hostplus Board and Executive, we are proud to present our Modern Slavery Statement for the financial year ending 30 June 2024. This document underscores our unwavering commitment to identifying, assessing, and addressing modern slavery risks within our operations, supply chains, and investments.

At Hostplus, we recognise that modern slavery is a grave violation of human rights encompassing a range of illegal practices, including trafficking of persons, slavery, forced labour, debt bondage, and deceptive recruiting. We condemn all forms of modern slavery and are dedicated to playing our part in combating this global issue.

Embedded in our approach to addressing the risks of modern slavery is our commitment to continuous improvement, transparency, and accountability. This is evidenced by the comprehensive risk assessments we have undertaken over the reporting period; and complemented by our collaboration with external experts to deepen our understanding and improve our response to these risks.

We have also made significant strides in updating our modern slavery framework, including the development of new due diligence processes and a Supplier Code of Conduct. These efforts are part of our broader commitment to responsible investment and ethical business practices.

Beyond direct supplier and external fund manager engagement, Hostplus has also continued its engagement with listed companies on a wide range of ESG-issues, including initiatives specifically relating to modern slavery risk, through our longstanding partnerships with the Australian Council of Superannuation Investors (ACSI) and Federated Hermes EOS. Hostplus engages ACSI and Federated Hermes EOS to research, engage, advocate and make voting recommendations to support Hostplus in our commitment to exercising active ownership.

As the actions outlined in this statement demonstrate, Hostplus is dedicated to contributing to the ongoing global effort to address modern slavery. We will continue to work towards incremental and meaningful action within our own sphere of operations and extend our gratitude to our team, partners, and stakeholders for their continued support and collaboration in this critical endeavour.

This statement was approved by the Board of Host-Plus Pty. Limited ABN 79 008 634 704, AFSL 244392 in its capacity as trustee for the Hostplus Superannuation Fund ABN 68 657 495 890, MySuper No 68657495890198 (the Fund) and in its capacity as trustee for the Hostplus Pooled Superannuation Trust ABN 13 140 019 340 (PST) in December 2024.

David Elia

Chief Executive Officer



Damien FrawleyChair of the Board

IDENTIFY THE REPORTING ENTITY

(Mandatory criteria – s.16(1) (a) and (f))

This is a joint modern slavery statement made pursuant to s.14(1) of the *Modern Slavery Act 2018* (Cth) (the Act) for the financial year ending 30 June 2024 (Statement).

The reporting entities covered by this Statement are:

- Hostplus Superannuation Fund (the Fund)
- Hostplus Pooled Superannuation Trust (the PST)
- Host-Plus Pty. Limited (ACN 008 634 704, AFSL No. 244392, RSE Licence No. L000093), which is the trustee for the Fund and the PST (the Trustee)

Host-Plus Pty. Limited (Trustee) is the trustee of the Hostplus Superannuation Fund (Fund) and the Hostplus Pooled Superannuation Trust (PST) (collectively referred to as 'Hostplus' hereafter). The above individual entities are specifically referenced where such differentiation is appropriate throughout this Statement to provide more accurate information in relation to a reporting requirement.

All numbers, statistics and facts described in this Statement are as at 30 June 2024, unless otherwise stated.

The Hostplus board of directors (Board) is ultimately accountable for our approach to identify, assess and mitigate modern slavery risks within our operations and supply chains. The Trustee has consulted with senior management representatives from both the PST and the Fund in preparing this statement.





STRUCTURE, OPERATIONS AND SUPPLY CHAINS

(Mandatory criteria – s.16(1)(b) and (f))



Corporate structure

Hostplus Pty. Limited (Trustee) is the corporate trustee (ACN 79 008 634 704) of the Hostplus Superannuation Fund (ABN 68 657 495 890) and the Hostplus Pooled Superannuation Trust (ABN 13 140 019 340).

The Hostplus Superannuation Fund (Fund) is a registrable superannuation entity (RSE) regulated under the Superannuation Industry (Supervision) Act 1993 (Cth).

The Hostplus Pooled Superannuation Trust (PST) is a type of unit trust regulated by the Australian Prudential Regulation Authority through which the Fund invests. It is used to facilitate the investment of assets that can include other superannuation funds, other PSTs, and other specified entities.

The Fund and PST are entities that the Trustee 'owns or controls' for the purpose of the Act. Each of these owned/ controlled entities is fully covered by the operational control, workforces, supply chains and executive decision-making processes of one or more of the reporting entities listed above and described in this Statement. Through this corporate and operational integration, the Trustee has consulted with its owned/ controlled entities, both in relation to the preparation of this Statement, and in the development and implementation of our overall modern slavery response.

The following diagram provides an overview of Hostplus' general structure, including the Trustee, Fund and PST:

Shareholders of RSE licensee: United Workers Union holds 300 ordinary shares - 50% Australian Hotel Association holds 300 ordinary shares - 50% **Host-Plus Pty. Limited** (ACN 008 634 704, AFSL No. 244392, RSE Licence No. L000093) **Trustee** Trustee Hostplus **Hostplus Hostplus Pooled Members** Superannuation Superannuation **Fund** Trust (ABN 68 657 495 890) (ABN 13 140 019 340) **SMSF Investors**

The Fund and the PST are governed and managed by our Trustee board of directors (the Board). The Board represents our members in accordance with the relevant trust deed of the Fund and the PST and superannuation law.



Operations

Hostplus is one of Australia's largest industry funds with 1,864,500 members and 312,610 contributing employers.

The Fund was established in 1988 and is a profit-to-member superannuation fund with origins in the hospitality, tourism, recreation and sports sectors. Hostplus' focus is on delivering the best retirement outcomes for members of the Fund. The Fund offers members the following core products and services:

- account administration services
- general advice
- financial advice
- insurance (income protection, death and total and permanent disablement cover)
- member education services
- investment options to cater for various risk appetites

The PST combines money from eligible super funds to invest in quality assets domestically and globally. The Trustee and selected managers handle these investments for Hostplus and other superannuation funds.

Hostplus offices are located Australia-wide, with the head office located in Melbourne.

The Hostplus team has continued to grow, with employee numbers increasing to 331 during the reporting period. Hostplus' business operations are solely conducted in Australia. All Hostplus employees are directly employed under an enterprise agreement and written employment contracts.













The Trustee has primary responsibility for the procurement of goods and services for the functioning of Hostplus' day-today operations.

Key operational functions that are outsourced to specialist third parties include:

- administration and member services for all Hostplus products
- insurance arrangements
- custodian services
- investment management
- proxy voting
- information technology managed services, including information security
- internal audit.

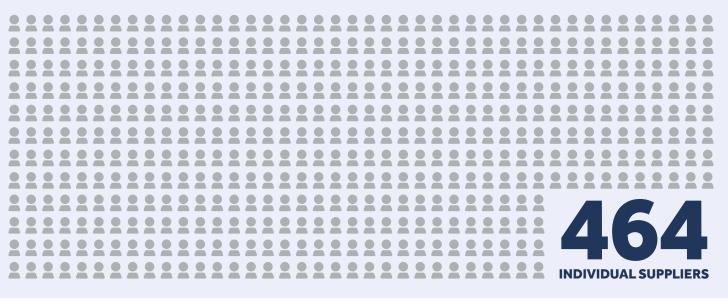
The key industry categories with which Hostplus engages in its first-tier (direct) supplier relationships include financial institutions, asset consultants, intermediary distributors, information technology vendors, and professional services in marketing, digital, consulting, property management, and legal services.

The Trustee procured goods or services from 464 individual suppliers throughout the reporting period. The overwhelming majority of these suppliers are based in Australia.

The Trustee's direct international suppliers are limited to:

- computer services providers in Ireland,
 Singapore and the USA
- a business service provider in Singapore
- telecommunications services in the USA.







Investments

The Fund's net assets attributable to unitholders was \$114,752,221,000.

Hostplus invests for the long term across a broad range of asset classes such as listed shares, property, infrastructure, credit, alternatives, and private equity (including venture capital).

To implement its investment strategy, Hostplus continues to rely on a range of experienced, specialist investment managers who invest on the Fund's behalf. Using external investment fund managers allows Hostplus to take advantage of their skill sets and deep access to investment opportunities to maximise future returns. In the reporting period, Hostplus, via the PST, engaged and/or retained the services of a total of 134 external investment managers

Investment managers are appointed by the Board after thorough due diligence is undertaken, and with the endorsement of the Fund's investment adviser (JANA Investment Advisers Pty Ltd). Once appointed, investment managers and the underlying investments are monitored on an ongoing basis.







RISKS OF MODERN SLAVERY

PRACTICES IN OPERATIONS, SUPPLY CHAINS AND INVESTMENTS



(Mandatory criteria - s.16(1)(c) and (d))

In the reporting period, Hostplus has taken action to identify and assess potential modern slavery risks within its operations, supply chains and investments. Acknowledging that any risk of modern slavery is a risk to the wellbeing of individuals, Hostplus has undertaken these assessments to understand the scope of business activities which may cause, contribute or be directly linked to modern slavery.

Hostplus appointed external consultants to undertake a risk assessment of its operational suppliers and investment portfolio. This development represents a significant update to Hostplus' risk assessment approach as compared to previous reporting periods.

Using their own proprietary, integrated assessment engine, the external consultant calculated the modern slavery risk profile of Hostplus' business activities to the tenth tier of the supply chain. This exercise was conducted using a balanced, global multi-regional input-output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. The MRIO was then examined against several international standards and key human rights data sources.

A proprietary algorithm was applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier and investment. This assessment does not purport to confirm the actual existence (or non-existence) of slavery in Hostplus' supply chains and investments.

This approach to modern slavery risk assessment has included examination and analysis of the suppliers, investments and industries with the most elevated risk of modern slavery, reported by geography, industry and the depth of the risk within the supply-chain tiers. The results of this exercise, as will be explored below, provide the basis for target areas for ongoing due diligence and steps to address modern slavery risk not only in the present reporting period but for upcoming years.









Operations

Hostplus' direct operations have been assessed as being a low risk for modern slavery. Hostplus' business operations are solely conducted in Australia. The Hostplus workforce is primarily comprised of tertiary-educated and experienced professionals who all operate in a very low-risk sector and are directly employed under an enterprise agreement and written employment contracts.

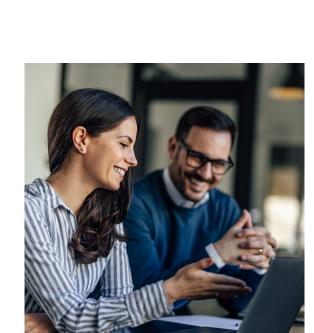
Hostplus' overall workforce may, from time to time, include a relatively small number of individuals working under fixed-term contracts. The very low operational risk of this is maintained by coverage under Australian National Employment Standards and the skilled and professional nature of the roles that are typically filled by shorter-term contracted employees.

Supply chains

When compared to the previous reporting period, Hostplus does not consider there to have been any material changes in its supply chain characteristics and procurement spend that are relevant to its overall modern slavery risk. Hostplus' direct suppliers are overwhelmingly Australian-based and include supplier categories typical for an Australian financial institution of its nature and size.

The results of the proprietary risk assessment indicate that the overall risk of potential modern slavery in Hostplus' direct supply chain is low. Nonetheless, areas of potentially elevated risk (in relative terms) were identified in sectors, such as Australian hotel, restaurant and catering services, which employ a relatively higher number of low-skilled, low-education or migrant workers who may be more vulnerable to exploitation.

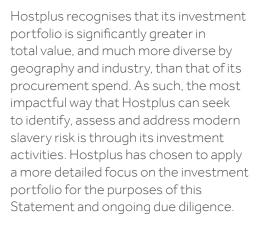
Indirect risks may be elevated within industries which rely on similarly vulnerable labour upstream in the supply chain. For example, business, financial and public administration sectors which rely on cleaning and recruitment services, or food and beverage retailers which rely on agricultural labour in the supply chain.











Similar to the supply chain analysis, Hostplus engaged its external provider to also conduct a modern slavery risk assessment for the investment portfolio.

The overall risk assessment results indicated a broad spectrum of potential risk levels in the investment portfolio. Notably, Hostplus' highest value investments were assessed as predominantly low risk at the first tier. This is because they were invested in a range of low-risk categories, such as Australian banking institutions.

Across the total portfolio, investments identified as having the highest inherent risks were those within emerging markets, such as India, Brazil, the Philippines and Sri Lanka, attributable to the relatively higher modern slavery prevalence in those areas. Geographic risk is frequently driven by factors such as corruption, forced displacement, conflict and political instability. The geographic risk across the investment portfolio is not confined to one specific region or country, owing to the wide range of assets across many asset classes. As described below in the section on addressing risk, another key area that was flagged in the risk assessment of Hostplus' entire investment portfolio relates to renewable energy sector activities in China.

A comparative view across asset classes indicated that assets with complex supply chains, or those reliant on manufactured products (such as retailers, construction, machinery and textiles), also carry potentially elevated risks of modern slavery. These risks are associated with the opacity of complex supply chains, high-pressure supply-and-demand business models, and a reliance on potentially vulnerable labour.

Several foreign investee companies were identified as priorities for further modern slavery due diligence. An overview of due diligence is provided in the following section of this Statement.







ACTIONS TAKEN

TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

(Mandatory criteria - s.16(1)(d))

As part of Hostplus' long-term commitment to significantly improve its overall approach to addressing modern slavery risk, Hostplus undertook a holistic update of the key pillars of its modern slavery response framework.



Governance

Comprehensive gap analysis of the modern slavery response framework

To ensure that Hostplus' comprehensive framework update was driven by internal priorities combined with subject matter expertise, Hostplus partnered with external subject matter specialists throughout the reporting period.

The first step was to undertake a gap analysis of Hostplus' approach to addressing modern slavery. Through this process, the Trustee identified a number of readily implementable changes that would result in immediate improvements across various key pillars, as well as actions requiring longer-term commitment and a staged implementation process.

Update of internal modern slavery policy and governance framework

Hostplus' Responsible Investment Policy specifically identifies consideration of human rights and labour rights, including modern slavery, as part of Hostplus' overall approach to responsible investment.

The update of the existing Hostplus policy and governance framework included:

- an update and expansion to the overarching Modern Slavery Policy
- updated terms of reference for Hostplus' internal Modern Slavery Steering Committee
- development of a Supplier Code of Conduct, which sets out Hostplus' core expectations relating to modern slavery risk in its own supply chains and operations
- updating the existing standard modern slavery clause for supplier contracts. This update focused on achieving improved outcomes and more clearly defining the scope of supplier expectations.

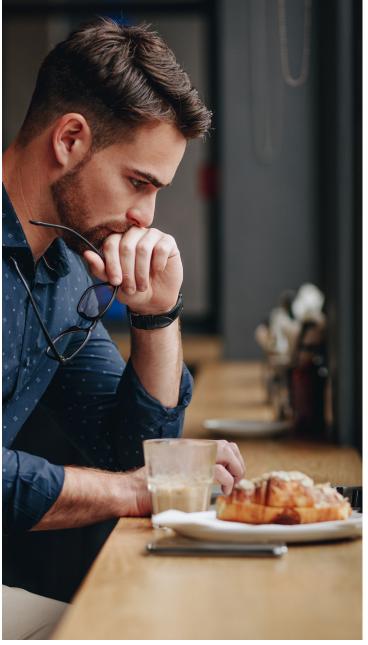














Due diligence

Development of a new due diligence framework for suppliers and investments

Acknowledging the distinct considerations and factors affecting modern slavery due diligence for the Fund's supply chains and investments, Hostplus has developed separate modern slavery frameworks for each. The purpose of these frameworks is to provide comprehensive and practical guidance for team members to integrate modern slavery due diligence into critical stages of the procurement lifecycle and investment process.

Tailored self-assessment questionnaires for external fund managers

In this reporting period, Hostplus issued a new self-assessment questionnaire to all its external fund managers as a baseline due diligence measure. The tailored survey was designed to understand and measure the quality of modern slavery assessment, due diligence and risk mitigation measures employed by fund managers.



Desktop audit reports on select high risk investments

In addition to the independent risk assessment conducted for the investment portfolio, external subject matter consultants conducted desktop due diligence reports on five investee companies. These companies were selected based on assessed relative risk levels. The due diligence focused on assessing individual company exposure to modern slavery risks, linkage to alleged instances of modern slavery, and the assessed adequacy of any established risk mitigation measures (based on published information).

The following table provides a general anonymised summary of the targeted desktop due diligence's key results.

Company description	Region of operation	Summary of key findings
Chemical manufacturer	Asia	The company has operations based in a high-risk region.
		The company had been named in several investigative reports alleging forced labour within its operations. The company has had imports banned in other countries because of the location of its operations.
Renewable energy manufacturer (wind)	Asia	The company has operations based in a high-risk region.
		The company had been alleged to either be supportive of, or a direct participant in, forced labour within its operations.
Renewable energy	Asia	The company had operations based in a high-risk region and in high-risk industry categories.
manufacturer (solar)		The company has published information that provides circumstantial support for alleged involvement with forced labour schemes.
		The company may have a commercial relationship with an entity that is subject to international trade restrictions.
Renewable energy-related manufacturer (electric vehicle, solar and battery)	Asia	The company has been named in third-party reports as allegedly having potential links to forced labour in its operations and supply chains. The company response to these allegations has not been characterised by evidence-based refutations.
Renewable energy-related manufacturer (electric vehicle, solar and battery)	North America	The company has been named in third-party reports as having potential supply chain linkages to alleged forced labour practices. It has previously been involved in litigation related to exploitation in its transitional metal supply chain.
		The company appears to have improved its modern slavery risk mitigation but may not have developed a robust approach to addressing risks relating to its key operations and supply chains in China.

Hostplus' investment in all the examined investee companies is, in relative terms, extremely small, given their primary concentration within a single portfolio through one externally managed fund. However, Hostplus viewed this as an important opportunity to implement the good practice principles of not exclusively prioritising considerations of commercial leverage, and to instead view such concentrated risk as an opportunity for positive future engagement with the relevant investment manager. In response to these findings, Hostplus is pursuing further direct targeted engagement with relevant external fund managers in relation to specific areas of the potential modern slavery risk within the investment portfolio.



Engagement

Investment engagement through ACSI and Federated Hermes EOS

Hostplus' external engagement on modern slavery issues extends beyond direct supplier and external fund manager engagement of the kind described throughout this Statement. Through the Fund's longstanding partnership with specialist engagement service providers in the Australian Council of Superannuation Investors (ACSI) and Federated Hermes EOS (**EOS**). Hostplus has continued its engagement with listed companies on a wide range of environmental, social and governance (ESG) issues, including initiatives specifically relating to modern slavery risk. Hostplus engages ACSI and EOS to research, engage, advocate and make voting recommendations to support the Fund in its commitment to exercise active ownership. Examples of these activities include collaborative engagement on worker exploitation and living wages, and improving supply chain transparency. Engagement outcomes may include addressing particular modern slavery risks identified within a company's supply chain, or improving disclosure on the risks companies face.



Training

Tailored training program for Trustee (procurement / supply chain) and investments

An external consultant provided specialised training to key members of the Hostplus investment team, including the deputy chief investment officer and the investment operations team.

Specialised training was completed by members of the legal, risk and compliance teams who oversee and assess modern slavery risk. Training was also undertaken by the chief risk officer, who has specific internal governance responsibilities for monitoring the Fund's modern slavery risk management framework.

The in-depth practical training that was provided covered topics such as how to undertake due diligence on suppliers, how to assess the quality of a supplier's risk mitigation framework, and how to deal with common issues when engaging with suppliers about modern slavery.

Remedy

Development of a Corrective Action Position Statement

Successive reporting periods of comprehensive risk assessment indicate the low likelihood of modern slavery practices of any kind in the Fund's operations or those of its direct suppliers. However, Hostplus recognises the importance of being prepared by developing clear and victim-centred remedial pathways. At the time of submitting this Statement, Hostplus was finalising a Corrective Action Position Statement, which confirms the foundational principles and steps that will be followed to ensure that appropriate remedial action is taken.

ASSESSING EFFECTIVENESS

(Mandatory criteria – s.16(1)(e))



As part of expanding its modern slavery risk response framework, Hostplus recognised the need for a more detailed and structured approach to measure the effectiveness of individual actions and the operation of the framework as a whole.

Hostplus understands that good practice in measuring effectiveness involves the adoption of key performance indicators (KPIs), ideally with both quantitative and qualitative metrics. At the time of finalising and lodging this Statement, a suite of KPIs covering all key pillars was under consideration. Hostplus anticipates reporting on the implementation of specific KPIs in its 2025 Modern Slavery Statement.

As an interim measure, Hostplus is using the following indicators to track continuous improvement in this area.

Response area	Activity overview
Policy	 Incorporation of supplier engagement and modern slavery due diligence into Hostplus' relevant policies and procedures.
	Addressing modern slavery in Hostplus' grievance/complaints mechanisms.
Governance	Regular scheduled and minuted meetings of Hostplus' Modern Slavery Working Group to oversee and implement the Fund's framework to address modern slavery.
	• Ensuring that the working group has cross-functional members from within the organisation.
Due diligence - investments	Implementation of due diligence procedures into the investment process.
	• Targeted due diligence with external fund managers, particularly those that manage investments with elevated modern slavery risk.
	Continued risk assessment of investments.
	Roll-out of training on modern slavery due diligence processes.
Due diligence – procurement and supply chains	Implementation of modern slavery due diligence procedures.
	Risk assessment and due diligence of suppliers at key stages of the procurement life cycle.
Measuring effectiveness	Development and approval of a multi-year action plan.
Training	Continued awareness-raising and training, both specialised and organisation-wide.
	• The maintenance of a year-on-year training completion rate that is at or near 100%.
External collaboration	Strategic engagement with third-party stakeholders on modern slavery issues beyond direct supplier relationships and external fund managers.









FY23 Modern Slavery Statement commitments – progress update

Hostplus recognises that demonstrating continuity between planned and executed actions across successive reporting periods is another hallmark of effectiveness. Here is a summary and a progress update of the key activities described in the 'Looking forward' section of last year's Statement.

Business unit	Commitment	Activity	Progress
Fund-wide	Continue to embed the modern slavery framework across the business.	Conducted a modern slavery gap analysis (as described above).	Completed
	Continue to enhance the modern slavery framework through ongoing engagement with internal and external stakeholders.	Update the Hostplus modern slavery framework during the reporting period through engagement and partnership with external advisors.	Ongoing
	Conduct risk assessments in relation to operations, supply chain and investment portfolio.	Conducted a risk assessment of the Trustee's suppliers and investments.	Completed
	Implement appropriate escalation and remediation actions where suppliers are unable to meet Hostplus' expectations.	Develop a Corrective Action Plan Framework.	In progress
	Measure the effectiveness of the modern slavery framework as part of ongoing audit and assurance activities.	Develop a new framework to measure effectiveness.	Ongoing
Investments	Play a role in making a positive change to labour rights practices both at a company/ asset level and broader industry and regional level.	Engage with ACSI and Federated Hermes EOS, whose long-term engagement programs and advocacy activities focus on addressing labour rights practices at an asset and industry level.	Ongoing
	Continue to review risk assessments and engage further with investment managers as required to understand their approach to addressing modern slavery risk within their respective investments.	Developing a due diligence framework to engage external fund managers on issues relating to modern slavery risk.	Ongoing
Procurement	Continue strong engagement with suppliers via risk-based assessments and questionnaires.	Hostplus continued to improve its response rate to supplier self-assessment questionnaires.	Completed
	Continue to engage with suppliers to assist them in their awareness and understanding of managing risks	Developing a due diligence framework to engage external suppliers on issues relating to modern slavery risk.	In progress
	associated with modern slavery.	Developed a modern slavery supplier code of conduct.	
Investments/ Legal/Risk and Compliance	Deliver internal training and communication	Issued the annual training module to all staff.	Completed
	to assist staff in taking appropriate action where modern slavery risks are suspected or identified	Delivered tailored training by third- party consultants to:	
	опаснанеа.	• key members of the investment team	
		• key members of the risk and compliance, and legal teams.	

OTHER RELEVANT INFORMATION

(Mandatory criteria – s.16(1)(g))



Planned actions

Hostplus is committed to demonstrating ongoing improvement in identifying, assessing and addressing modern slavery risk in the supply chains. In FY25, Hostplus intends to focus on the following key activities:

Business unit	Activity
Investments	Review the Responsible Investment Policy to consider incorporating further modern slavery provisions.
Procurement	 Refine the procurement due diligence framework. Implement a supplier code of conduct.
Modern Slavery Working Group	 Develop a 3-year roadmap. Update the modern slavery framework. Implement new effectiveness metrics. Develop a Corrective Action Plan Framework to remediate reported instances of modern slavery. Develop a strategy for increased engagement with external collaborators.
Risk	 Develop the RACI (responsible, accountable, consulted, informed) matrix to support an updated modern slavery framework. Review the Whistleblower Policy to incorporate modern slavery provisions.
Legal	 Review contract provisions to identify clauses relevant to modern slavery. Seek to identify key metrics/KPIs to measure success of those provisions.
Human resources	 Update training materials to include relevant updated policies, including modern slavery. Deliver training to key stakeholder groups as required.

As noted in the section above on assessing effectiveness, Hostplus recognises that demonstrating continuity and consistency of planned and executed actions between successive reporting periods is an important feature of transparent and good practice modern slavery reporting. This is a key reason for including the above overview of Hostplus' planned actions for the next reporting period, even though such descriptions are not required as part of the Act's mandatory reporting criteria.

However, it is important to note that the above summary, and all other forward-looking descriptions contained throughout this Statement, reflect Hostplus' reasonable expectations at the time of submitting this Statement. Such forward-looking statements are predictive, based on good-faith judgements, assumptions and available information and should not be unduly relied upon as being certain, or even likely, to actually occur in the future. While Hostplus is committed to continuously improving our modern slavery response, these forward-looking statements are not intended to, and should not be taken as constituting, any representation, guarantee, warranty or assurance as to the accuracy or likelihood that any action described in any forward-looking statement will be achieved.

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