



Modern Slavery Policy

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Motor Trades Association of Australia

Superannuation Fund Pty Limited

ABN: 14 008 650 628

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1. Trustee's position on Modern Slavery

Motor Trades Association of Australia Superannuation Fund Pty Limited (**Trustee**) is the trustee of Spirit Super (**Fund**). The purpose of this Modern Slavery Policy (**Policy**) is to affirm the Trustee's commitment to contributing to the elimination of modern slavery and to outline the Trustee's approach to reducing the risk of modern slavery practices within its operations and supply chains.

2. Scope of Policy

This Policy applies to all directors, officers, employees and entities (including their directors, officers and employees) associated with the Trustee and the Fund and to all contractors, suppliers and service providers (including investment managers) that have an agreement with the Trustee, or an entity associated with the Trustee to provide goods or services to the Fund.

3. 'Modern Slavery'

Modern slavery is a serious violation of a person's dignity and human rights and occurs where coercion, threats or deception are used to deprive individuals of their freedom. Modern slavery includes human trafficking, slavery, servitude, forced labour, debt bondage, the worst forms of child labour, forced marriage and deceptive recruiting for labour or services. The *Criminal Code* sets out various offences for engaging in modern slavery.

Modern slavery does not include workplace issues such as substandard working conditions or underpayment of wages, though the Trustee acknowledges these may escalate to modern slavery in certain circumstances.

The Trustee is aware that, while certain sectors or geographical locations may give rise to a higher risk of modern slavery, modern slavery can occur in any location or sector.

4. Trustee's commitment to reducing modern slavery

The Trustee acknowledges that modern slavery is a growing and complex problem, best addressed by a collective commitment on the part of the business community to end all forms of modern slavery. The Trustee affirms that, as a participant in the Australian business community, it is committed to contributing to this common goal.

5. Principles underpinning the Trustee's Modern Slavery Program

The Trustee has implemented a Modern Slavery program which is based on the following principles:

- Raising the awareness of all officers, employees, contractors, suppliers, and service providers to the risks of modern slavery in the Trustee's operations and supply chains is fundamental to the successful implementation of a Modern Slavery program.
- Each person involved in the work of the Trustee has a responsibility to consider and assess the risk that the Trustee's operations or supply chains may involve the use of modern slavery in the production or sourcing of goods or the performance of services.
- When considering the risk of modern slavery in the Trustee's operations and supply chains, it is the risk to the human rights of the individual involved in the production of goods or the performance of services that must be considered.
- The risk of modern slavery also has the potential to impact the sustainability of the Trustee's operations, including its investments, with a consequential impact to members.
- Environmental, social and governance issues, including modern slavery, are important considerations for the Trustee in the context of making investment decisions.
- The Trustee is committed to implementing systems and controls to ensure that the risks of modern slavery practices in its business and supply chains are identified, addressed and, where appropriate, remedied.
- While processes adopted under the Trustee's Modern Slavery program may not result in the identification of instances of modern slavery existing deep within the Trustee's supply chains, the leverage the Trustee may be able to exert in its dealings with contracted service providers could see a reduction over time of modern slavery in those supply chains.
- The effectiveness of the Trustee's Modern Slavery program should be regularly assessed with a view to continuous improvement.

6. Policy Requirements

(a) Engagement and Training

All officers, employees, contractors, suppliers and service providers are required to comply with this Policy.

All officers and employees must complete training on Modern Slavery as required under the Trustee's training program.

(b) Investment Portfolio

The Trustee addresses modern slavery risk when making decisions affecting the Fund's investment management arrangements, including external fund managers and other key service providers. The Trustee will give effect to this primarily through its Procurement Policy, however the identification of modern slavery risk is also integrated into the Trustee's Environmental, Social and Governance (ESG) Policy that also applies to its direct investment activities. The Trustee has limited scope to assess modern slavery risk at the individual security holdings level given these securities selection decisions are generally outsourced to external parties and executed in real-time at those parties' discretion.

(c) Supply Chain

The Trustee expects all suppliers and service providers to operate in full compliance with the laws and regulations of the jurisdiction where goods are sourced/procured, or services performed, and to use their best endeavours to ensure that there is no modern slavery in their supply chains or operations.

Where the Trustee is proposing to enter a contract for goods or services (including in relation to the renewal of an existing contract), it will require compliance with this Policy as a condition of that contract. Staff responsible for the procurement of goods or services are required to assess the risk of modern slavery in respect of the intended procurement. The Trustee's procurement and outsourcing policies detail:

- the risk assessment and due diligence processes which are intended to identify suppliers/service providers that do not have a strong commitment to identifying and reducing the risk of modern slavery; and
- the terms and conditions relevant to modern slavery that should be included in agreements with suppliers/service providers.

As part of its ongoing commitment to ending modern slavery and to ensure adequate annual reporting (see (f) below) to the Department of Home Affairs, via the Australian Border Force business unit, the Trustee will require its service providers to demonstrate the presence of modern slavery policies and the assessment of the risk of modern slavery in their operations and supply chains.

(d) Reporting modern slavery concerns

The Trustee treats modern slavery concerns as a compliance and ethical issue. Reports of suspected instances or risks of modern slavery (whether in the Trustee's operations or supply chains) or of a failure to comply with this Policy may be made in accordance with the Trustee's Whistleblower Policy, including through the use of the Whistleblower hotline.

If the Trustee becomes aware of any facts to suggest that one of its partners engages in modern slavery, the Trustee will thoroughly investigate, and where appropriate, terminate the relationship and report to the responsible national or international authorities.

The identification of any instances of modern slavery which may have been caused by or contributed to by the Trustee shall be reported to the Trustee's compliance function and will be treated as an incident under the Trustee's compliance program.

(e) Continuous improvement

As part of its commitment to continuous improvement, the Trustee reviews its modern slavery program annually with a view to assessing the effectiveness of the program and identifying opportunities for improvement.

(f) Modern Slavery Statement

The Trustee issues a modern slavery statement annually as required under the *Modern Slavery Act 2018*.

7. Distribution of this Policy

This Policy will be made available to all officers, staff, contractors and service providers and will be published on the Fund's public-facing website.

8. Review of this Policy

This Policy will be reviewed by the Trustee annually. The Trustee may also review this Policy at any time for any reason.

9. Revision History

| Version | Reason for amendment | Date approved | Approved by |
|---------|---|----------------|-------------|
| 1 | First version: to articulate Trustee's commitment to reducing modern slavery and outline Trustee's Modern Slavery Program | 27 August 2020 | Trustee |
| 2 | Minor amendment to reflect change of name of Fund from MTAA Super to Spirit Super | 25 August 2022 | Trustee |
| 3 | Annual review | 30 August 2023 | Trustee |