

Legal Super Pty Ltd

Modern Slavery Statement financial year ended 30 June 2025

Dated 28 November 2025

1. Approval by the principle governing body of the reporting entity

Legal Super Pty Ltd ABN 37 004 455 789, AFSL 246315, as Trustee of legalsuper ABN 60 346 078 879 is the reporting entity and issuer of this Modern Slavery Statement (**Statement**) which has been prepared in accordance with the Commonwealth *Modern Slavery Act 2018* (**Act**).

The Board of Legal Super Pty Ltd is its principal governing body, and has approved this Statement on 28 November 2025. It is signed by the Chair of the Board of Legal Super, as responsible member, on its behalf.

Signed



Kirsten Mander
Chair
Legal Super Pty Ltd
Dated: 28 November 2025

2. Location of mandatory criteria

	Criteria	Section	Page
16.1(a)	Identification of reporting entity, approval by the principle governing body of the reporting entity, and signed by a responsible member	Approval by the principle governing body of the reporting entity, Reporting entity structure, operations and supply chains	1-2
16.1(b)	Describe the structure, operations and supply chains of the reporting entity	Reporting entity structure, operations and supply chains	2
16.1(c)	describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Identifying risks of modern slavery practices in operations and supply chains	3-4
16.1(d)	describe the actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes	Actions taken to assess and address these risks, including due diligence and remediation processes	5
16.1(e)	describe how the reporting entity assesses the effectiveness of such actions	Assessing the effectiveness of these actions	5-6
16.1(f)	describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	Process of consultation with any entities the reporting entity owns or control	6

16.1(g)	include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Other relevant information	6
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3. Context and purpose

The Commonwealth *Modern Slavery Act* 2018 (**Act**), commenced operation on 1 January 2019, establishing a national modern slavery reporting requirement.

Developments in modern slavery law and its focus on supply chain transparency align with our practices of conducting due diligence on suppliers and implementing measures to identify and address modern slavery risk.

We do not tolerate, support or engage in acts of modern slavery and human trafficking occurring within our business and supply chain. We expect our people, our suppliers, and their employees, whether permanent or temporary, to be treated with respect and dignity at work.

The purpose of this Statement is to detail the activities we have undertaken in relation to modern slavery risks in our operations and supply chains and our approach to this commitment for the financial year ended 30 June 2025 and the steps we intend to take over the coming year.

We have applied a methodology (described below) to undertake a risk-based assessment of our operations (including our investment operations) and supply chains and identify any areas with a higher potential of modern slavery risk.

4. Reporting entity structure, operations and supply chains

Legal Super Pty Ltd ABN 37 004 455 789, AFSL 246315 is the trustee (the **Trustee**) for legalsuper ABN 60 346 078 879, Registrable Superannuation Entity Licence number L0002585 (the **Fund**) and is the reporting entity under the Act that must prepare this Statement that sets out our efforts to assess and address the modern slavery risks in our operations and supply chains.

The Fund is a superannuation provider and our vision is to empower people in Australia's legal community to build wealth for their life in retirement. As an industry fund, we always act in the best financial interests of members. All profits are returned to members. We do not pay commissions. No dividends are paid to shareholders.

As at 30 June 2025, our total funds under management were approximately \$6.8 billion, with 18,277 employers who pay super for their staff to the Fund and 47,275 members who have their retirement savings with the Fund.

The Trustee is a not-for-profit company responsible for ensuring that the Fund operates as a complying and regulated superannuation fund in accordance with the *Superannuation Industry (Supervision) Act* 1993. It also ensures that the Fund is operated in accordance with its Trust Deed and all relevant laws and regulations.

The Trustee is governed by a Board, that has 10 directors including an Independent Chair who is appointed by the Board. The other nine directors are nominated by the Australian Services Union, the United Services Union, The Victorian Bar Inc., the Law Institute of Victoria Limited and The Law Society of New South Wales.

The Board has the following sub-committees:

- Administration & Insurance Committee - responsible for overseeing the Fund administrator, member insurance arrangements, and the operating cost budget.

- Audit, Risk & Governance Committee - responsible for the financial reporting framework, both internal and external audit, the Risk Management Framework, and oversight of compliance with the legislative, prudential and regulatory obligations of the Trustee.
- Investment Committee - responsible for overseeing implementation of the investment strategy, advising the Board on the design of investment options including the risk and return objectives and strategic asset allocation; investment policy; and the appointment or termination of the custodian, external advisors and investment related service providers.
- Remuneration & Nomination Committee - responsible for making annual recommendations to the Board on the remuneration of the senior executives and others in accordance with the Board's Remuneration Policy; and determining the processes for the interview of nominees for the role of Director and making a recommendation to the Board.

The day-to-day management of the Trustee is delegated to the Chief Executive, Company Secretary and other senior executives. The Trustee's headquarters are in Melbourne. As at 30 June 2025, it had 46 employees mostly based in Melbourne, but with some working in other Australian States. The employees support functions such as Trustee operations, investments, legal, risk and compliance, member services and member experience.

Service providers have been appointed by the Trustee to assist in the delivery of the Fund's products and services, and legal contracts have been entered into with each of its significant service providers. These include the Fund's administrator and custodian, each of its investment managers, information technology providers, legal and tax advisers, an insurer, a direct investment platform provider, communications and other consultants and service providers undertaking important outsourced activities. Our service providers are mostly located in Australia, although some services may be sourced overseas, as set out in this statement.

The Fund invests in a range of asset classes, managed by third party investment managers¹ whose details are available on the legalsuper website. Assets are located in Australia and overseas.

5. Identifying risks of modern slavery practices in operations and supply chains

The Act defines "modern slavery" as including the following eight types of serious exploitation:

- trafficking in persons or organs;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour.

Modern slavery risks are assessed with a focus on potential harm to individuals rather than risk to the Fund portfolio, or the business. This involves reviewing areas within our internal operations and supply chains where the risk to people is likely to be highest. Key factors considered include the severity of potential modern slavery practices, the likelihood of their occurrence, and the potential scale and duration of impact. Based on our assessment, the risk of modern slavery risks within our direct business operations, and our Australian based third party suppliers is low. We remain committed to complying with all workplace health and safety requirements applicable to our workplace, including any remote working arrangements. Aligned to our values and code of

¹ DIO option allows members to invest directly in certain listed assets.

conduct, our Whistleblower Policy and Service Provider Framework Policy provides another governance avenue to identify potential modern slavery risks.

Investing in higher risk sectors and geographies

Our externally managed investment portfolio spans Australian and international equity markets, property, infrastructure and private equity investments. Our investments are in a number of geographies, including Asia. We also have investments across sectors including energy, IT, material, financial services, property, healthcare and telecommunications. As research shows that the Asia-Pacific region has the largest concentration of people in slavery-like conditions in the world², and identifies high-risk sectors to include financial services, (including IT procurement) property, food beverages and agriculture, mining and healthcare, where we have investments in that region, or those sectors, we have asked our investment managers to report back to us with relevant information on our externally managed investments.

Questions of our third party investment managers (where they are a reporting entity under the Modern Slavery Act 2018) are to help us to better understand geographic and sector based modern slavery risk in relation to our investment portfolio. We use the information they provide to better understand how our investment managers are addressing the risk that modern slavery may be present on our portfolio, identify improvements over the reporting period, and identify where further attention may be required. This ongoing due diligence places a large emphasis on the extent and quality of their governance and risk management approaches.

Further information on our approach to selecting and monitoring investment managers, and investing is set out in our Annual Report and Product Disclosure Statement.

Other operational risks

Separately from our investment managers, we also identified material service providers and suppliers and issued them with specific modern slavery questionnaires for them to complete to describe their processes of identifying and managing modern slavery risks. Coverage also included non-material service providers in some of the higher risk industries such as information technology, electronic, catering and clothing manufacturing.

All questionnaire responses were reviewed by the Trustee's Risk and Compliance Team. Service providers had implemented processes and procedures to identify, assess and address any risks. There was only one self-identification of medium or high-risk practices as noted by our Administrator who outsources some functions to India and noted staff recruitment in India as a high risk sector and has applied additional due diligence of its recruitment suppliers to mitigate risk of slavery practices. Furthermore, many of our larger suppliers have their own modern slavery frameworks including their own Modern Slavery Statement and are subject to modern slavery reporting regimes. Accordingly, we concluded that our service providers and suppliers are not operating in high-risk industries, or out of countries with high risks of modern slavery practices, and that our modern slavery risk arising from these types of suppliers would be low.

Our legal agreements with our major outsourced providers prevent them from subcontracting activities offshore without our knowledge and consent.

6. Actions taken to assess and address these risks, including due diligence and remediation processes

In 2024/2025 we have:

² <https://acsi.org.au/wp-content/uploads/2020/01/ACSI-Modern-Slavery-Report.Feb19.pdf>

- ensured all new investment management agreements and 'material' supplier contracts have contractual provisions that address modern slavery requirements;
- updated our modern slavery questionnaire to better understand how our investment managers are addressing the risk that modern slavery may be present in our portfolio, identify improvements over the reporting period, and identify where further attention may be required;
- continued our participation in investor forums, including various ACSI events;
- reviewed and updated our ESG screening processes in relation to directly held listed equity assets;
- renewed our commitment to Australian Council of Superannuation Investors (**ACSI**) membership. ACSI exists to provide a strong collective voice on ESG issues on behalf of its members. ACSI provides research and advice on ESG risks and opportunities that have a material impact on investment outcomes. With the assistance of ACSI, we collaborate to achieve genuine, measurable and permanent improvements in the ESG practices and performances of the companies and entities in which we are invested;
- improved our due diligence, risk management, training and supplier engagement systems and processes to ensure modern slavery risks are considered, effectively managed and mitigated;
- continued to build our people's awareness of modern slavery risks in our business and supply chains through annual mandatory risk and compliance training (including modern slavery risk training), and Board and executive briefings; and
- implemented a new third party risk management system, which ensures consistency of approach and clarity with respect to our values and expectations when onboarding new suppliers, and monitoring the services they provide.

7. Assessing the effectiveness of these actions

Our new third-party risk management system centralises the risk assessments and due diligence activities for the onboarding of service providers and helps with their ongoing monitoring of any heightened risks by our risk and compliance team, under the leadership and responsibility of our Head of Compliance. The effectiveness of our monitoring and due diligence is assessed at least annually via the following criteria:

- Review of management's approach via the issuance of a survey to service providers and investment managers with a view to capture recent developments in how they are overseeing, implementing and reviewing modern slavery related risk management.
- This review is then accompanied by an action plan to track their progress with the management of their exposure to modern slavery risk. We are committed to continuously improving our assessment processes to get to better practice in the coming years.

In addition to the above, we report:

- completion of modern slavery training as part of the risk and compliance induction training and annual ongoing risk and compliance training by all legalsuper staff;
- continuing to issue our (revised) annual Modern Slavery Questionnaire to selected suppliers, which has enabled us to monitor their own governance processes, particularly with respect to investments in riskier geographies and industries. There was noticeable improvement in suppliers performing due diligence and conducting supply chain analysis to ensure modern slavery has been identified and addressed in their own organisations;
- participation by risk and compliance staff at relevant industry discussion forums/briefing sessions (where available) on modern slavery issues; and
- review of our employees' compliance to policies, standards and procedures.

8. Process of consultation with any entities the reporting entity owns or controls

The reporting entity, Legal Super Pty Ltd, is the trustee for legalsuper, a regulated superannuation fund. No other entities are owned by Legal Super Pty Ltd. In preparing this Statement, relevant senior executives were consulted, and the Board has reviewed and approved this Statement.

9. Grievances and remediation

Any concerns regarding modern slavery risks in our operations and supply chains, may be reported anonymously as described in our Whistleblower Policy available at legalsuper.com.au or raised by contacting us on 1800 060 312 (Monday - Friday, between 8:00am and 8:00pm Australian Eastern Standard Time (AEST)) or via email at mail@legalsuper.com.au.

10. Other relevant information

The maturity of assessing modern slavery risks within our supply chains will be further enhanced as part of our commitment modern slavery improvements.

Our commitment to human rights is supported by a number of internal policies. These include:

- Investment Governance Framework
- Valuation Governance Framework
- Risk Management Framework
- Compliance Framework
- Conflicts Management Framework
- Responsible Investment Policy
- Code of Conduct
- Whistleblower Policy
- Fraud & Corruption Policy
- Service Provider Framework
- Privacy Policy
- Enquiries & Complaints Policy
- Anti-Money Laundering & Counter Terrorism Financing Program
- Workplace, Health and Safety and Wellbeing Policy

11. Approval

The Board of Legal Super Pty Ltd has approved this Statement. This Statement will be updated annually.

Signed



Kirsten Mander
Chair
Legal Super Pty Ltd
Dated: 28 November 2025.

Legal Super Pty Ltd is the issuer of this Modern Slavery Statement (**Statement**). Legal Super Pty Ltd ABN 37 004 455 789, AFSL 246315, as Trustee of legalsuper ABN 60 346 078 879. Level 9, 627 Chapel Street, South Yarra, VIC 3141.

This Statement provides general information only and does not take into account your individual objectives, financial situation or needs. You should consider your own financial situation, objectives and needs and read the legalsuper Product Disclosure Statement (**PDS**) and Target Market Determination (TMD) before making any decision in relation to legalsuper. The relevant PDS and TMD can be obtained by contacting legalsuper or at legalsuper.com.au. Past performance is not a guide to future performance.